



Yerevan

**municipal elections
of September 17, 2023**

FINAL REPORT

Yerevan 2023



This report presents the findings of "Akanates" Observation Mission's long-term and short-term observation of Yerevan Municipal Council elections of September 17, 2023.

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The contents of this document are the responsibility of the member organizations of "Akanates" Observation Mission and do not necessarily reflect the views of the donor.

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"AKANATES" OBSERVATION MISSION

YEREVAN MUNICIPAL ELECTIONS OF SEPTEMBER 17, 2023 FINAL REPORT

**Yerevan
December 2023**

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ACRONYMS

OSCE	Organization of Security and Cooperation of Europe
CE	Council of Europe
DEC	District Electoral Commission
ODIHR	Office for Democratic Institutions and Human Rights
CEC	Central Electoral Commission
RA	Republic of Armenia
CNCO	Community Non-Commercial Organization
LLC	Limited Liability Company
AOS	Audit and Oversight Service
PEC	Precinct Electoral Commission
AMD	Armenian dram

ABSTRACT

On September 17, 2023, the scheduled municipal elections of Yerevan city were held.

"Akanates" Observation Mission embarked upon observing the electoral processes preceding the elections, on Election Day and after the elections. It assessed compliance of all these electoral processes with the electoral legislation of Armenia and international standards. It also assessed the municipal elections from the perspective of potential risks that might jeopardize holding the elections in a free, transparent and competitive manner.

The observation mission took place between August 1 and October 13, 2023.

Methodology

The observation of Yerevan municipal elections was conducted by a mixed method of desk research and field observations conducted by 10 short-term and 60 long-term observers. Both qualitative and quantitative data were gathered via direct observation, meetings, interviews, analysis of campaign events, media coverage and social media posts. As necessity arose, the Observation Mission also collaborated with other actors involved in the electoral process deployed in the field. The accuracy and validity of non-official data identified during the various phases of the observation mission was cross-checked by multiple independent sources.

Desk research focused on developments preceding the elections and affecting the pre-elections atmosphere, the composition of the electoral commissions, issues related to voter registration, compilation of voter lists, funding of parties and their expenditures, misuse of administrative resources, allocation of state funding, use of social media during the campaign, voter turnout, formation of Yerevan local self-governing body, including the first convening of the Municipal Council (Council of Elders in Armenian), election of Yerevan Mayor and the oath of office ceremony. "Akanates" mission used CrowdTangle & Meta Ads Library tools developed by Meta for observing the electoral campaign in social media.

During long-term observation, our mission examined the processes preceding and following the elections in the areas covered by 10 of Yerevan District Electoral Commissions (DEC). That included observation of elections administration, party (alliance) campaign office activities, campaigning itself, misuse of administrative resources, performance of electoral process participants, receipt of ballot bags from polling stations and tabulation of election results.

Short-term observation included observation of the voting process and result counting with rotational visits to 290 polling stations (61% of the total 475) and on-site observation. The focus of short-term observation were the processes occurring on election day, the situation in the polling stations, around the stations, as well as around party campaign offices and the general atmosphere in the city on election day.

Based on significant irregularities found in the electoral processes, the Mission lodged complaints with the Central Electoral Commission (CEC) and District Electoral Commissions, and also reported to the police.

Observation findings

The election campaign officially started on August 23, that is 25 days before Election Day. In reality, however, a number of political forces started campaigning and using certain resources in order to attract voter sympathy much earlier than the official campaign start.

In the backdrop of lack of regulations in the Electoral Code of RA on misusing administrative resources before the campaign period, ruling "Civil Contract" party and its representatives intensively misused administrative resources while preparing administration of elections. This led to an unequal competitive environment where the candidate of the ruling party gained an outstanding advantage over the others.

The Mission also noticed dissemination of campaign promotional materials, including associated materials by other political forces and their candidates before the official campaign start. Many of these promotional materials continued to be used during the official campaign. This, too, contributed to the overall distortion of the pre-electoral competition.

Administration of elections, in general, complied with the schedule instructed by the CEC and with the Electoral Code of RA.

Gender representation in the district electoral commissions and precinct electoral commissions (PEC) did not in general cause alarms, however the commissions were predominantly chaired by men, while the secretaries were predominantly women, which we found problematic. It was not possible to scrutinize possible conflict of interest in relation to the main jobs held by commission members due to its non-disclosure to the public.

The working venues and facilities of DEC's continue to be substandard and are not conducive to a performance usually associated with a decent and dignified job. The quality of information published on the Central Electoral Commission's (CEC) website is not sufficient for proper public oversight. The trainings for PEC members generally meet high standards, however the quality of performance at the commissions is often unsatisfactory.

The RA Police has not fully tackled the issues raised for years on voter addresses. Problematic addresses with a large number of registrants persistently reappear in voter lists.

The elections campaign overall ran smoothly and calmly, despite tensions arising from security threats on the borders of Armenia, wide-spread counter-campaigns and slander carried out by fake social media users and pages, and mudslinging between the competing candidates that has become business as usual. Citizens were alarmed by the unprecedented volume of repair and reconstruction activities carried out in Yerevan, a fact testifying to abuse of administrative resources.

Inclusion of women in candidate lists is deemed satisfactory, however, it is also noted that their inclusion was only meant to meet the bare minimum of the law. Party lists also had excess non-party members who were added to the lists post-registration.

In the backdrop of publication of election manifestos not being a mandatory requirement by law, two of the competing political forces participated in the elections with none. Parties mostly ignored the official requests for information sent by our Observation Mission.

A multitude of modalities were employed for organizing the election campaigns. The total campaign expenditures amounted to 557 mln Armenian drams (AMD), of which more than half – 299 mln AMD – were declared by "Civil Contract." Given the voting results, the per capita campaign cost in the campaign funds of the political forces altogether amounted to 3747 AMD, wherein the highest per capita cost belonged to "Homeland Power" (Uzhy Hayrenyats) and "Country to Live" (Aprelu Yerkir) parties, which did not pass the electoral threshold. The campaign of "Civil Contract" party was boosted by the use of administrative resources, including by allocations from the state budget. It is clear, however, that the finances and efforts exerted into campaigning did not achieve the expected results of the political parties, as the decisions of the voters were driven by other factors.

The Mission has observed multiple violations of rules set for disseminating campaign materials, most frequently these violations were in relation to "Civil Contract", "Homeland Power" and "Country to Live" parties. Campaign materials appearing in non-designated sites or otherwise in violation of law, were not duly removed by institutions in charge.

"Civil Contract" widely abused administrative resources by gathering the heads and staff of Yerevan's administrative districts, as well as those of educational institutions, state and community organizations in campaign rallies to show mass rallying. It also used the work done by local self-governing bodies, unscheduled cultural and entertainment events in order to promote its own campaign.

Many cases were observed when minors were recruited into campaign activities. The campaign rhetoric of "Public Voice" (Hanrayin Dzayn) party and "Mother Armenia" (Mayr Hayastan) alliance was characterized by hate speech, name-calling, personal targeting and overall hostility. In a number of instances, the campaign materials glued/installed by political forces were damaged, campaign activities were obstructed.

A number of acts featuring elements of crime were noted. In some of these cases, "Akanates" Observation Mission's activities were obstructed by representatives of "Civil Contract". In others, our mission took note of cases when material benefits were offered for participation in rallies. Such incidents were recorded in relation to "Civil Contract's" campaign rallies when young persons were offered money for marching. Another example was the campaign tactics of "Country to Live" party, when along with disseminating campaign materials, it also handed out gift-cards to some voters. This created an apparent expectation amongst receivers of gift-cards that were going to receive some sort of a good.

Research of party property and income declarations, payments deposited to the campaign foundations of the parties and the single alliance and disclosures of their expenditures, as well as annual financial reports of parties made it apparent that it is in fact impossible to oversee party and campaign financing and to ensure their legality. Notably, these financial documents are not disclosed in a uniform manner, which makes it impossible to compare them against each other. Thus, a full picture of their financing is not portrayed. The disclosed data are incomplete, are not machine-readable and sufficiently accessible and therefore do not allow

for proper processing, data reuse and reproduction. The conclusions made by the Audit and Oversight Service of CEC (AOS) do not contain ample information about the issues it has identified and measures it has taken to address them. Some of the parties also fail to disclose their annual reports and, where required, also their audit statements.

The processes involving preparation of elections in the polling stations, voting and vote count overall complied with procedures set forth by law and no serious irregularities were observed. In general, Election Day was peaceful.

Obstruction of observer access to the polling station was reported only once. The other significant irregularities involved representatives of various political forces, and were sporadic and uncoordinated. Issues related to voting secrecy were mainly caused by designating an improper venue for the polling station or improperly setting up the voting rooms. Technical and procedural issues can be mainly attributed to lack of necessary knowledge and sense of responsibility and discipline among PEC members. Cases when observer statements on irregularities were not registered in the election record books demonstrate the attitude of certain PEC chairpersons and secretaries toward the requirement of the law.

Irregularities documented during tabulation of voting results were related to rectification of flawed tasks by PECs, including rectification of flaws in bundling voting items and compiling the final protocols on election results.

"Akanates" lodged three complaints with the electoral commissions and four reports on crime with the law enforcement bodies in relation to the irregularities it has documented.

Recommendations

To improve electoral processes, enhance the democratic principles by which they are guided, establish justice and increase public trust towards electoral processes and results, as well as to ensure the further effectiveness, transparency and accountability of local self-government bodies, it is necessary to revise the Electoral Code and affiliated regulations, specifically those in relation to organization of local elections, electoral practices and approaches pertaining to them.

More specifically, it is recommended to:

- Set out a mandatory requirement that in the event the post of the Mayor of Yerevan is left vacant, a new mayor must be elected, otherwise legal repercussions will follow, including new municipal elections.
- Amend the legislation to make sure that community municipal council members are not allowed to hold any other public service post. This will ensure the full autonomy and independence of local self-governance.
- Improve the regulations and procedures on the composition of DEC and PECs, gender representation, responsible and unbiased performance of work, exclusion of conflict of interests, as well as enhance the professional training of DEC and PECs, their working conditions, availability of equipment and furnishing conducive to work.
- Encourage the electoral commissions to take initiative to prevent violations of campaign rules, conduct proper oversight and accountability over campaign

processes, effectively process reports on violations. All of these improvements will foster the commissions' transparency and accountability.

- Verify and clarify problematic addresses in the voter lists, protect the personal data of voters when publishing lists with voter signatures without jeopardizing public oversight over this issue.
- Create legal grounds that will safeguard the transparent and accountable performance of political forces running for elections, the proper representation of genders and party members in candidate lists, effective implementation of requirements for making alliances.
- Clarify and tighten requirements for campaign materials, their dissemination, organization of campaign events, as well as oversight and accountability for detected violations.
- Adopt tighter requirements and accountability for campaign promotion in the Internet, conduct research and accordingly take measures aimed at more effective oversight and ruling out of any potential foreign collusions.
- Define by law "third parties" engaged in an election campaign and set out rules ensuring the transparency of the campaign and financing of these parties.
- Tighten the regulations forbidding and restricting misuse of administrative resources, create effective grounds for informing public servants about these measures and for preventing the misuse of administrative resources.
- Improve and tighten requirements and oversight over disclosure of data in annual party reports, party property and income declarations, campaign foundation disclosures in terms of how they must be filled in and reported. Take measures to enable full oversight over reports on financing, use of assets and relevant reports. Make the oversight process transparent.
- Set out proper mechanisms of checking and approving the appropriateness of polling station venues, including their accessibility, allow access to video recordings of the election day available on CEC website at least until the final date for disputing election results, replace muted video recording with sound video-recording, make sure that the electronic voter devices are programmed in a way that the zero tape (zero report) can be printed in a timely manner.
- Recognize the legal standing of election observation organizations in lawsuits involving violation of rights related to their status as observers, and recognize the right of observation organizations to challenge objective violations of electoral rights.
- Facilitate administration related to appeals by removing payment of state duties for lawsuits related to electoral processes and revise the regulations on terms within which appeals are received and decisions on them are made by electoral commissions.

INTRODUCTION

On September 17, 2023, the scheduled Municipal Council (called Council of Elders in Armenian) elections took place in Yerevan.

13 parties and 1 alliance of parties took part in Yerevan municipal council elections. The election processes were overseen by three joint local observation missions and two international observation missions.

28.46% of the citizens with the right to vote participated in the elections.

As a result of the elections, the new Yerevan Municipal Council was formed representing 5 political forces – parties "Public Voice" (Hanrayin Dzayn), "Civil Contract", "National Progress", "Republic" and "Mother Armenia" alliance (hereinafter, alliance) of "Country of Apricot" (Yerkir Tsirani) and "Intellectual Armenia" parties.

OBSERVATION METHODOLOGY

"Akanates" Observation Mission observed Yerevan municipal elections from August 1 to October 13, 2023.

The goal of "Akanates" mission is to oversee compliance of electoral processes with the legislation of the Republic of Armenia (RA), as well as with international norms and best practice.

The observation of Yerevan municipal elections was conducted by a combined method of desk research and short-term and long-term field observations conducted by observers.

Desk research focused on developments preceding the elections and affecting the pre-electoral atmosphere, composition of the electoral commissions, issues related to voter registry, voter list-making, party funding and expenditures, misuse of administrative resources, allocation of state funding, use of social media for campaign purposes, voter turnout, formation of Yerevan local self-governing body, including the first session of the Municipal Council, election of Yerevan Mayor and the oath of office ceremony. The data was collected from open sources, such as the websites of the Central Electoral Commission (CEC), Yerevan Municipality and other online open sources, through official requests for information, media coverage and social media posts.

"Akanates" mission used the *CrowdTangle* and *Meta Ads Library* tools developed by Meta for tracking the electoral campaign in social media. The first tool was used to analyze party and candidate page interactions and related patterns (likes, shares and comments), as well as Yerevan Municipality and administrative districts page interactions between August 1 and September 15, 2023. *Meta Ads Library* was used in order to explore advertisements tagged by the political forces and candidates, as well as by Yerevan Municipality and administrative districts "political" on Facebook, Instagram and Messenger platforms between the period of June 15 and September 15, 2023. It was also used to track how much money was spent for these ads.

During our long-term observation, 10 of our observers examined the processes preceding and following the elections in the areas covered by 10 of Yerevan District Electoral commissions (DECs). That included elections administration, party (alliance) campaign office activities, campaigning, misuse of administrative resources, performance of electoral process participants, receipt of ballot bags from polling stations and tabulation of election results. Both qualitative and quantitative data were collected by a mixed method including direct observation, meetings, interviews, analysis of campaign events, content analysis of media coverage and social media posts. As necessity arose, the Observation Mission also collaborated with other actors involved in the electoral process deployed on the field. To provide more detail, our observers made 83 visits to DECs, observed 20 commission meetings, 40 trainings of commission members involving 767 participants. 32 meetings and

discussions were held with representatives of district administrations (taghapetarans), 82 visits were made to campaign offices of parties and alliances, 35 meetings were held with other actors involved in the electoral process, such as the police, condominiums, media etc. 50 addresses with abnormal numbers of registered voters were verified, 110 campaign events were observed. A total of 310 meetings were held with 563 community residents. The long-term observers also followed up with the procedures involving PEC delivery of election documents to DEC.

Short-term observation included observation of the voting process and vote count. On Election Day, 60 mobile observers made visits to 290 polling stations (61% of the total 475) and conducted on-site observation. Attention was paid to the situation in the polling stations, around the stations, as well as around party campaign offices and the general atmosphere in the city on Election Day. Both qualitative and quantitative data were collected through observation.

[iDitord](#) online platform was used to collect data from citizens and other stakeholders on alerts of irregularities that took place during the election campaign and on Election Day.

The accuracy and validity of non-official data identified during the various phases of the observation mission was cross-checked by multiple independent sources.

Based on significant irregularities documented on the electoral processes, the Mission filed complaints with the Central Electoral Commission (CEC) and District Electoral Commissions, as well as reported to the police.

All the data, findings and analyses compiled during the observation mission were briefed in "Akanates" ongoing statements, on the Mission's Facebook page, often in the format of "Akanates Diary", via press releases and visuals.

OBSERVATION FINDINGS

The findings of our Observation Mission are presented below in the chronological order of electoral phases and periods. These include the developments and atmosphere preceding the elections, the period of official campaigning, election day, the post-election phases and the formal establishment of Yerevan self-governing body, all the way to the first session of the Municipal Council, the election of Yerevan Mayor by the Council and the oath of office ceremony.

1. Developments preceding the elections

As is required by the Electoral Code of RA, the official campaign was set to start on August 23, 25 days before Election Day. In reality, many political forces started promoting their campaign and exerting resources to win over the much earlier than the official campaign start.

Ruling political force's campaign

In the backdrop of lack of regulations in the Elections Code on misuse of administrative resources before the official campaign period, "Civil Contract" party and its representatives

intensively misused administrative resources along with organizing the pre-electoral processes. This led to an unequal competitive environment where the candidate of the ruling party gained a marked advantage over the others.

Political restructurings and concentration of administrative leverages

The outgoing Municipal Council of Yerevan that served from 2018 to 2023 was formed after the Velvet Revolution based on the ballots cast on September 2018, where the winner was "My Step" Alliance made up of "Civil Contract" and "Mission" (Arakelutyun) parties with front-runner Hayk Marutyan taking over the post of Mayor.

The last couple of years have seen certain political restructurings in Yerevan municipality, which affected the sentiments underlying the scheduled Yerevan municipal elections, the quality of the political competition and its results.

The start off, on December 22, 2021 Yerevan Municipal Council, in closed session, [sacked](#) Hayk Marutyan by secret ballot and [elected](#) Marutyan's first deputy, Hrachya Sargsyan of "My Step" alliance as Mayor.

Soon after, on March 31, 2022, "Civil Contract" party officially [announced](#) its upcoming candidate of Yerevan municipal elections – Tigran Avinyan, who served as first Deputy Prime Minister of Armenia from May 2018 to August 2021. Avinyan [quit](#) office after the snap parliamentary elections of June 2021.

On September 23, 2022, the Municipal Council [elected](#) Tigran Avinyan as Deputy Mayor of Yerevan. Avinyan [took over](#) coordination and oversight in the departments of construction and urban repair (urban beautification), culture and tourism, public utilities, transport, as well as the work of Yerevan's administrative districts and the infrastructure projects conducted jointly with the central government. It is important to note that before taking office, coordination of the work of heads of administrative units and joint infrastructure projects was only the prerogative of Yerevan Mayor and [was not entrusted](#) to any deputy, something [acknowledged](#) by Avinyan himself. Additionally, instead of Hrachya Sargsyan, Avinyan started attending Cabinet meetings. He [excused](#) himself by his past experience of deputy prime minister.

On March 17, 2023, Mayor Hrachya Sargsyan resigned. "My Step" Alliance did not endorse any new candidate taking advantage of the loophole in the "Law on Local Self Governance in Yerevan City" which does not mandate election of a new mayor in the event of resignation and therefore also does not clarify the legal ramifications that may follow. Unlike Yerevan, regulations on elections of local self-governing bodies by proportional party lists for other communities of Armenia (RA Electoral Code, Article 142.3) establish that in the event of mayor's resignation, new snap elections are held within a period set out by the municipal council but not later than within one month. The law also says that if a community head is not elected within two weeks after convening a council session, then the government suspends the powers of the municipal council in accordance with the "Law on Local Self Governance", Article 69, Part 2.

Thus, first Deputy Mayor, Levon Hovhannisyan formally took over the post of Mayor as required by Article 132.1 of the Electoral Code according to which a head of community can

be appointed from among members of the municipal council, by the indirect voting of the proportionally elected municipal council.

In the meanwhile, a significant redistribution of tasks was carried out, with Tigran Avinyan taking over a significant portion of mayoral functions, including those involving publicity. This artificially augmented his public visibility and ensured much more significant access to administrative resources.

One of such powers was coordination of Yerevan municipality's internal affairs and [chairing](#) over Municipal Management Briefings (regular livestreamed public meetings with the participation of the Municipality's units, public service providers to the community, such as safety and security (police), water supply private company etc.). Tigran Avinyan took over chairing these briefings in violation of legal norms and Decree N 1993-A of June 13, 2017 of Yerevan's Mayor on "Holding Municipal Management Consultations by Yerevan Mayor." The decree stipulates that "consultations are held by Yerevan Mayor, and in the absence of Mayor, by the first Deputy Mayor of the city." This decree was amended by Decree N 715–A on March 31, 2023, four days after Avinyan [actually chaired](#) over the first briefing. The amendment said that in the absence of Yerevan Mayor, the Municipal Management Briefings might can be chaired by any of the deputies, an amendment that adjusted the regulation to the existing practice.

It should be added that along with assuming the duties of Yerevan Deputy Mayor, Tigran Avinyan retained his post of Chairperson of "Armenia State Interests Fund" (ANIF) [Board of Directors](#), a closed joint stock company with 100% state-owned shares. This prompted the RA Corruption Prevention Committee to probe the incompatibility of holding both positions, the results of which were forwarded to the office of Armenia's Prosecutor General. A [criminal probe](#) was initiated on alleged misuse of public service powers in the private sector or misuse of influence affiliated with such public service in the private sector. Avinyan's powers in ANIF's Board of Directors were suspended only on November 10, 2023 by the [order](#) of Minister of Economy, Vahan Kerobyan.

Along with rising the post of Yerevan Mayor, Tigran Avinyan also retained his post of Chairperson of [Board of Trustees](#) of Armenia's National Polytechnic University, which he holds up to today.

State budget allocations to Yerevan Municipality

Analysis of the state budget allocations to Yerevan Municipality from 2019 to 2023 shows that the government almost doubled the Municipality's financing in the spring of 2023 transferring around 20.6 bln AMD against close to 10 bln AMD in previous years. This was an outstanding increase in financing over the preceding years when state transfers never exceeded 10 bln AMD. Our examination of Armenia's Budget Execution documents shows that starting the year of 2020 the government reduced state budget allocations approved by the parliament year by year (these allotments decreased by 433.5 mln AMD in 2020, by 1,778.3 mln AMD in 2021, and by 369.4 mln AMD in 2022).

Even if the execution of Yerevan Municipal budget was [evaluated](#) as an improvement over previous years, we cannot help but view doubling the community's budget in the second

quarter of the fiscal as a financial boost aimed at reaping public sympathy towards the ruling force in the upcoming municipal elections and attaining competitive advantage over the other contestants. Certain doubts could also arise from the expedience of making these allotments, doubts over the ability and preparedness of the municipality to expend them in an earmarked and effective manner.

The 2023 additional budget allocations to Yerevan Municipality were made on the basis of Government Decree N [531-N](#) of April 13, 2023. Appendix 3 of the decree specified that the responsibility/right for the implementation of certain activities were transferred from the Ministry of Territorial Administration and Infrastructure to Yerevan Municipality with the respective additional 9,9 bln AMD transferred from the State Reserve. A significant part of this allotment was planned for the following activities.

Purpose	Amount/thousand AMD
Modernization of apartment complex elevators	4,729,840.0
Building roads and ongoing road repairs	1,651,196.0
Repair and Construction of Yerevan Metro	1,691,000.0
Construction and capital reconstruction of recreational sites and parks	1,563,036.2
Construction and capital reconstruction of preschools	831,902.2
Construction of gas pipeline in Nor Kharberd District	522,963.4
Modernization and expansion of the sewage system	452,878.1
Capital reconstruction of health facilities	242,208.7

On his Facebook page, Tigran Avinyan [published](#) a graph showing funding for the construction and capital reconstruction of backyards in Yerevan over the years (supposedly at the expense of the additional allocations from the state budget) and emphasized the five-fold increase of that funding in 2023 over 2022 and the "unprecedented number of backyards – 210 in total" that are planned to be reconstructed.

In the run-up to the elections, large-scale urban repair and beautification activities were carried out in various administrative districts of Yerevan, including asphaltting, reconstruction of residential backyards, replacement of curbstones etc. During "Akanates" observer meetings with city residents, we were told that many issues that had long been neglected started to be addressed, something obviously done to reap citizen votes.

The sharp increase of funding from the state budget to Yerevan Municipality is in stark contrast to the volume of funds given to the rest of 70 communities of Armenia. This comes to prove that political expediency takes central role and the central government's approach is episodic and discretionary.

Cases of early campaigning

It was apparent that "Civil Contract" party was already campaigning for the upcoming municipal elections when in August 2022, Tigran Avinyan [showed up](#) for the liquidation of the consequences of the fire in "Surmalu" shopping center.

In September 2022, right after being elected Deputy Mayor, Avinyan convened a [series of public meetings](#) in the administrative districts of Yerevan, events actively covered by mass media. Part of these media reports were related to his *ex officio* functions, however there were episodes there that could be reasonably perceived as an intentional election campaigning.

A manifestation of an apparent election campaign was the [apartment gift](#), given on behalf of the community, to a popular Yerevan singer named Forsh. Such lavish gifts to figures of the arts world had stopped from 2018. The justifications for this gift and for picking this recipient or timing of making the gift were not transparent and clear and cannot be interpreted in any manner other than election campaigning. Other similar instances where the ceremonious kick-off of the new fleet of [trolley-buses](#) in the public transportation system on July 8, the announcement of [forestation](#) plans in the territories that used to be "Dalma" orchards on July 24, the [driving](#) of the last public transportation "gazelle" mini-van on August 11. This latter event caused the patrol service to later [fine](#) Avinyan for violating driving regulations, specifically for driving a vehicle he did not have a driving license for and for driving it without fastened seat belts.

Before the official kick-off of the election campaign, certain officials in community service started an active promotion of "Civil Contract." Here are some of these examples:

- The utilities department of Qanaqer-Zeytun administrative district made a [post](#) on its Facebook page on July 21 that the district (Qanaqer-Zeytun) initiative group of "Civil Contract" party made an unscheduled convening on July 18 during which they presented their municipal council candidates as approved by the board.
- [Andranik Avetisyan](#), deputy head of Malatia-Sebastia administrative district, [published](#) promotional materials related to "Civil Contract" party as an avatar to his Facebook page.
- Serob Sargsyan, deputy head of Ajapnyak administrative district, actively [campaigned](#) for "Civil Contract" on his Facebook page.
- Workers of Ajapnyak administrative district participated in the fundraiser evening organized by "Civil Contract" party and published a [photo](#) with the Prime Minister.
- Narine Chobanyan, another worker of Ajapnyak administrative district, actively campaigned for "Civil Contract" and [criticized](#) Hayk Marutyan by sharing a video material about his intention to run for the Mayor.

Printscreens from these Facebook posts can be found [here](#).

Starting in August 2023, [banners/billboards](#) were installed in Yerevan with the following statements "You Told Us" "We Did It" and with "Civil Contract" logo and name. These banners/billboards remained installed during the official campaign period.

Problematic pledges and initiatives

In addition to the above-mentioned campaigning instances, representatives of "Civil Contract", including Tigran Avinyan himself, made problematic pledges and moves during their campaign.

2 months before Yerevan municipal elections, the municipality made a [call](#) for forming a Council of Youth Affairs under the Mayor inviting applications by August 14. That same council was disbanded by the same municipal officials a few months after they sacked Hayk Marutyan on the grounds that its existence did not make any sense. An impression is left that reviving this council in the run-up to the elections was going to attract young voters, even though no facts were uncovered to support this assumption later on.

The ruling political force also made announcements about mega projects that had not been approved in municipal and ongoing urban development programs. Instead of taking urgent measures to engage professional organizations and communities around developing the new Master Plan of Yerevan (the current Plan expired in 2020) and giving systemic and comprehensive solutions to the problems of the city, representatives of "Civil Contract" came up with mouthful strategic proposals and political pledges, such as [construction](#) of "Ajapnyak" [metro](#) station, construction of [one more metro](#) station in the vicinity of "Petak" shopping center, construction of a new [rope-way](#).

Coverage using public media

Since assuming the post of Deputy Mayor of Yerevan in September 2022, Tigran Avinyan's official work was intensively promoted by media, including by public means of communication, such as the Public Television of Armenia, Facebook pages of Yerevan Municipality and administrative districts. Tigran Avinyan's daily work, his meetings with Yerevan residents, his assessment of pressing issues, his pledges, instructions and other activities were covered with particular rigor. Public television aired interviews with him, for example on April 17 with [Petros Ghazaryan](#) and on May 21 with [Shushan Rafayelyan](#). These shows carried a strong campaign pretext.

The intensity and volume of Public television coverage of Avinyan's activities exceeded that of the acting Mayor of Yerevan, other Deputy Mayors of Yerevan, the previous two Mayors of Yerevan and most strikingly, of all the heads and deputy heads of other communities of Armenia altogether.

Campaign by other political forces

Before the official kick-off of the elections campaign, other political forces and their candidates also disseminated campaign promotions or associated materials (which remained in place during the campaign period too). Although these materials are not forbidden by law if their costs are properly documented in the financial reports, they contribute to the overall distortion of the contestation environment.

- Mane Tandilyan, frontrunner of "Country to Live" party, featured on [banners](#) with the headline "Your Mother City" and various calls to action. She also featured on

banners with the [cover page](#) of "Prestige" journal with similar posters posted on building walls and residential house elevators.

- [Posters](#) clearly associated with "Country to Live" party, stating "Artsakh Shall Live," featured in various districts of the city.
- "[Madam Minister](#)" film was aired on TV and the [banners](#) of the film were installed all over the city. The film is associated with "Country to Live" party and its candidate Mane Tandilyan (herself a former Minister and MP).
- Hayk Marutyan's one-man [show](#) "The Mayor" that was staged yet in 2022, was made available online.
- Banners/billboards featuring Andranik Tevanyan of "Mother Armenia" Alliance and Hayk Grigoryan of "National Progress" party were seen on the highways leading up to Yerevan gates.
- [Billboards](#) featuring Natalya Roternberg, number two in "Homeland Power" party list, were installed in many sites in the Center of Yerevan.
- [Videos](#) made by "Democratic Mobilization" party rolled out over the Internet.

It should also be added that in addition to "Civil Contract" campaign promotions of mega urban development projects that did not match to the City Master Plan, "Country to Live" also came up with promises of infrastructure projects, such as construction of rope-ways.

2. Election Administration

The administration of elections in general complied with the Electoral Code of Armenia and the schedule set out by CEC. The electoral processes were organized by CEC through 10 District Electoral Commissions stationed in Yerevan.

Central Electoral Commission

On October 7, 2022, the composition of the Central Electoral Commission changed. The municipal elections of Yerevan of September 17, 2023 were the largest elections handled by the newly formed CEC. The commission carried out its job well, the elections were well organized and went smoothly. It is noteworthy, however, that CEC's response to widespread misuse of administrative resources was not proportionate and adequate.

Since its announcement of Yerevan municipal elections on July 18, 2023 until September 17, 2023, Election Day, the Central Electoral Commission convened 9 sessions during which it discussed issues related to election organization, including self-recusal applications of a number of candidates. No notable issues were observed in relation to these meetings.

Information about the work of the CEC and DEC's, including the schedule of meetings, online streaming of meetings, video-recordings and adopted decisions are available on CEC's website www.elections.am. The website is resourceful and user-friendly, most of the information is in open-data and accessible formats, however there are certain important documents and materials that do not meet with the criterion of accessibility and are not searchable. Specifically, the decisions of the CEC, DEC's and the Audit and Oversight Service (AOS) conclusions are published in a scanned pdf format, the contents of which cannot be word-processed, including copied.

In the [section](#) on CEC proceedings, two applications can be found. One was submitted by "Democratic Mobilization" party on September 20, 2023 on account of Nikol Pashinyan's participation in the campaign rally on September 15, which the party alleged to be abuse of power and his use of hate speech. This application was dismissed for not meeting the required deadline, although it could not have possibly been submitted earlier. The other proceedings is a motion by DEC's on September 22 to repeal the certificates of a number of members of electoral commissions qualifying them for their posts. Information on how this motion was processed is not available in this section, instead all related actions can be found under the Decisions section of the website.

District Electoral Commissions

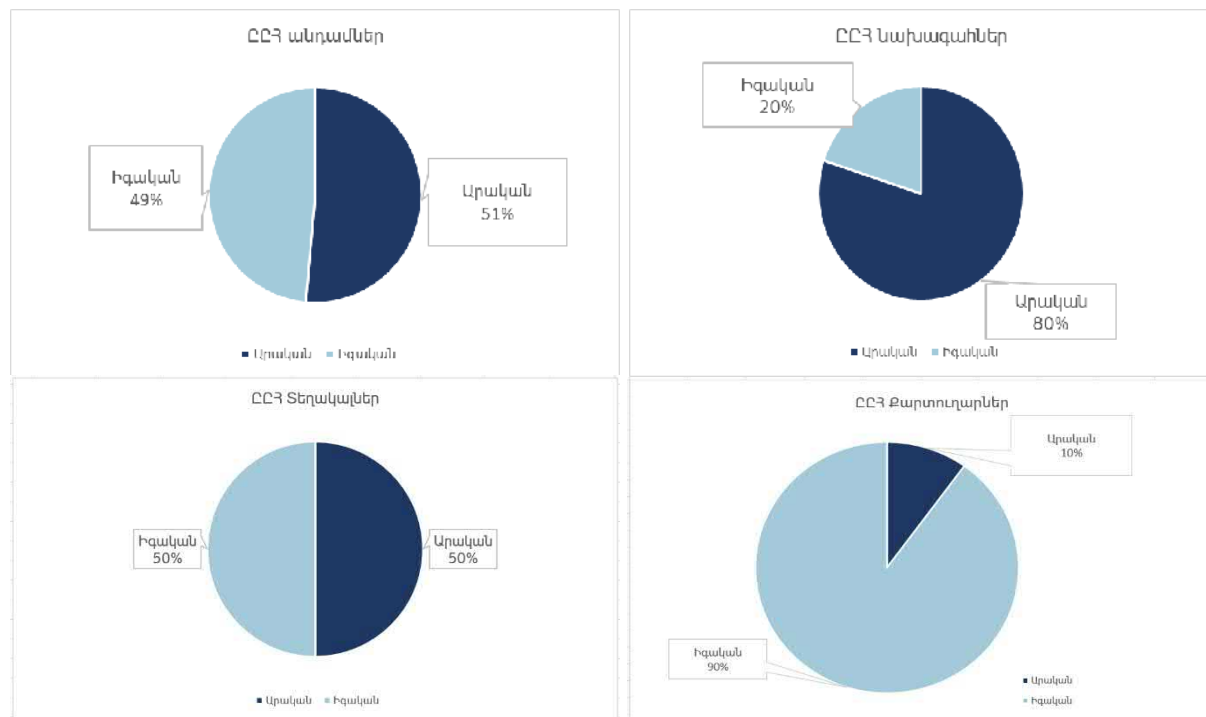
The areas covered by the existing [10 DEC's](#) of Yerevan mostly match with the administrative divisions of Yerevan with the exception of two commissions. District Electoral Commission Number 9 covers Center and Nork Marash districts with Commission N 10 covering Erebuni and Nubarashen administrative districts.

In general, DEC's operated in a due manner with no incidents and irregularities noted.

DEC Composition

Article 43, Part 2 of the Electoral Code of RA requires that the gender composition of the DEC's be no less than two from each gender.

Gender representation in DEC's is almost equal, with women comprising 49% and men – 51% of the commissions. Yet, 80% of the chairpersons of the DEC's are men, while 90% of the secretaries are women, a picture that raises an alarm.



"Akanates" has made information requests to CEC inquiring about the jobs and occupations of DEC members. The information received was contradictory. At the beginning, CEC mentioned that members of DEC, as specified in their applications, did not hold positions mentioned in Article 41, Part 2 of the Electoral Code. At the same time, CEC also mentioned that it did not possess information about the other jobs/occupations of DEC members. The Central Electoral Commission also informed that DEC candidates do present biographical information, however "this information cannot be provided on the grounds of Article 26, Part 1 of the Law on Protection of Private Data as the law does not grant transfer of or access to this data to third parties, and there is no consent by the given entities."

This high level of confidentiality of DEC member jobs and their compatibility with electoral functions does pose a problem in terms of electoral transparency and conducting oversight over their possible involvement in electoral campaigning.

During our observations, however, we did not come across persons in the DEC, who would not qualify for holding their position from the legal perspective. It is notable, however, that there were certain commission members who held community service jobs, a situation potentially leading to conflict of interest.

Specifically, DEC N1 covering Avan administrative district has at least 4 members who work at the district municipality. The same can be said about at least 5 members of DEC N 4 covering Arabkir district, 3 members of DEC N 6 covering Ajapnyak district and at least 3 members of DEC N 8 covering Shengavit district. This kind of fusion of administrative district staff and district electoral commissions alarms us.

It is true that these situations do not conflict with the requirements of Article 41, Part 2 of the Electoral Code and Article 41, Part 4 of the Law on Public Service, however they pose a problem from the perspective of maintaining DEC independence. When such jobs are held in parallel, certain risks of administrative misuse arise because the public servants are exposed to the influence of their employers/supervisors and are constrained to take independent stances and have much wider opportunities to influence citizens who are also the recipients of their service.

In one instance, when one of "Akanates" observers contacted the staff of Avan administrative district, Ara Ayyvazyan, Chairperson of DEC N 1 (covering that same district) called back and suggested that all questions be discussed and meetings be held with him instead of contacting administrative district staff. It is notable that he himself is a staff member of the same administrative district, heading the unit dealing with communal services and management bodies of apartment complexes. A similar instance took place in Erebuni administrative district when a DEC member suggested our observer not to visit the administrative district staff and instead ask all the questions directly to them because they are also an employee of the district administration office.

The instance that took place in relation to Sona Sargsyan, Chairperson of DEC N 6, posed a greater concern as she heads CEC's Internal Audit Department. Under this configuration, a higher commission's representative is simultaneously working at a lower commission.

Another problematic instance was the presence of a DEC member at the campaign office of "Civil Contract" party. During working hours, one of "Akanates" observers came across Boris Grigoryan, member of DEC N 3, at Qanaqer-Zeytun campaign office of "Civil Contract" party. Grigoryan works at Avan administrative district's unit dealing with communal economy and management bodies of apartment complexes.

Working conditions and accessibility

The offices and working conditions of DEC offices continue to pose a concern, as they are not conducive to decent and dignified work.

DECs N 2, 3, 7, 8 and 9 are not fully accessible, their entrances are not equipped with ramps, their entrance steps are too high.

In DECs N 3 and 8, our Observation Mission took note of the dire working conditions. DEC N 3 is located on the first floor of the building at Davit Anghaght 11, the administration of Qanaqer-Zeytun district. Its office is not equipped with adequate air ventilation. The office of DEC N 8 located in the building of the Vocational School N 1 of Yerevan. The office space has no windows and access to natural light, it also lacks a ventilation system, its internet connection is poor, the toilets are in a dire hygienic condition. The staircase leading up to the office is inconvenient, there are no ramps or even staircase handrails. In contrast to this, the room designated for working sessions and trainings is renovated and equipped with necessary devices and furniture, however it too lacks a ventilation system.

Working sessions

A total of 40 working meetings were convened by all 10 DECs between August 7 and September 18, 2023 with 40 decisions adopted during these meetings. Documents on approving the members of the precinct electoral commissions (PECs) under respective DECs were amended as the duties of a number of them were prematurely suspended.

According to Article 52 of the Electoral Code, the DEC should oversee execution of the requirements of the Electoral Code in the area under its mandate. Despite numerous cases of irregularities related to dissemination of campaign ads and misuse of administrative resources, none of the DECs initiated administrative proceedings at their own initiative.

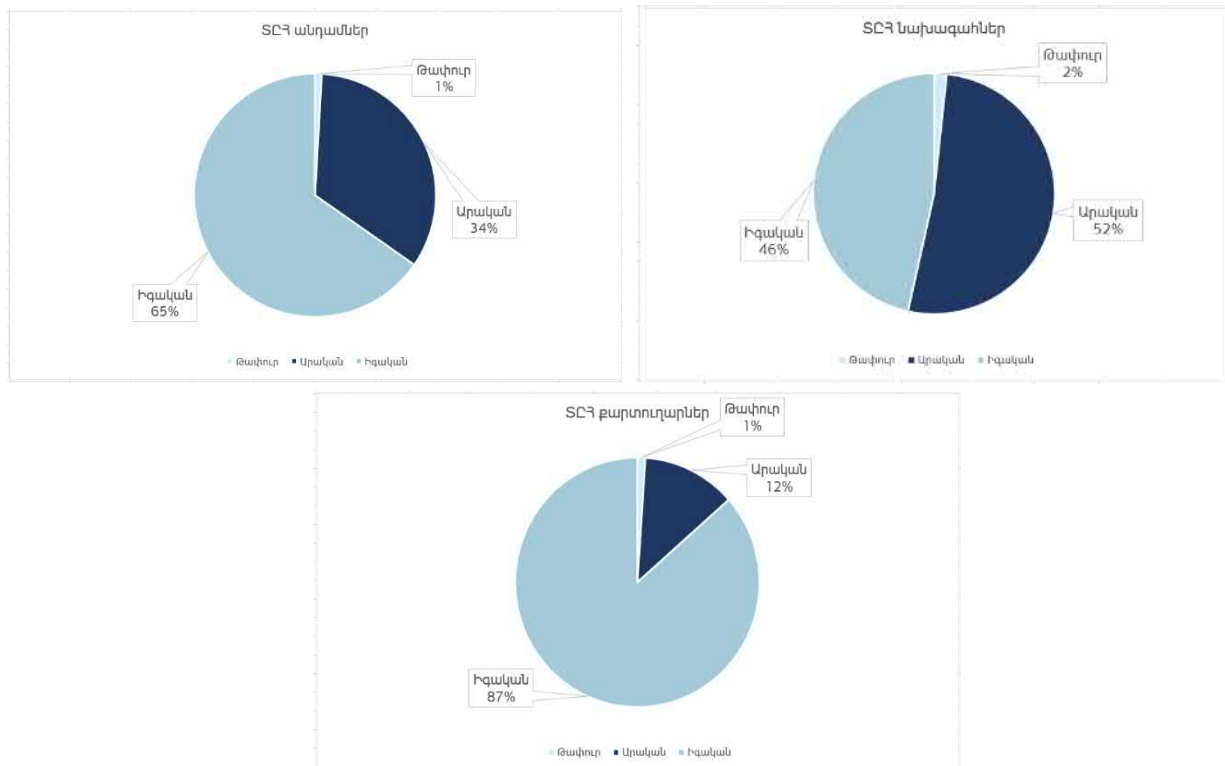
Our observers were in constant contact with all 10 DECs and verbally presented alerts about promotional materials installed/glued in non-designated sites and about other irregularities. In general, the cooperation of DECs with the observers may be assessed as open and constructive with no hurdles created. DECs N 8 and 9 took steps to remove the campaign promotional materials found in non-designated sites. They would, however, reappear in the same sites. Other DECs took no measures towards this aim.

Precinct Electoral Commissions (PEC)

Voting was organized in 475 polling stations where around 3800 members of precinct electoral commissions were deployed.

Composition of PECs

65% of all the jobs in PECs were occupied by women, with only 40% of them heading the commissions as chairpersons and with 87% of them acting as commission secretaries.

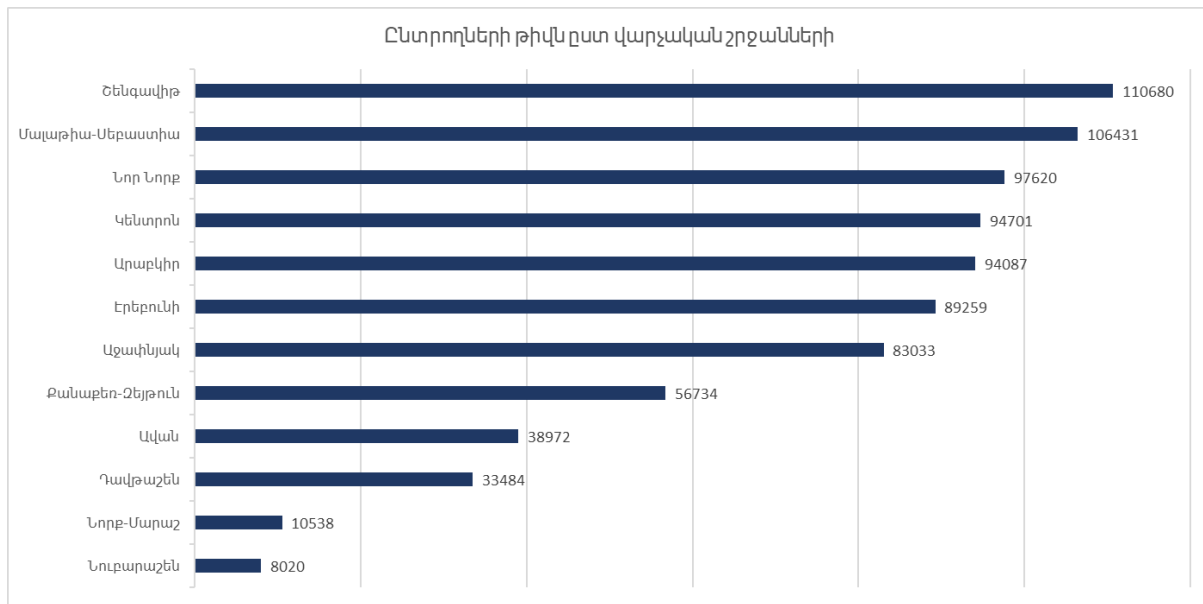


Training of PEC members

Trainings of PEC members convened on September 2, 2023 with overall 40 courses organized for them. According to the appraisal of our observers, the quality of teaching was high, with the organization of training process rated higher than average. Issues that were observed were related to the attendance of PEC members. To be more specific, 767 PEC members participated in the trainings that we observed, however 180 of them participated partially.

Registry of Voters

According to the Electoral Code, citizens of Armenia who have attained the age of 18 and have been registered in Yerevan for at least 6 months, and non-citizens of Armenia who have attained the age of 18 and have been registered in Yerevan for at least 1 year have the right to participate in municipal elections. The total number of voters with the respective suffrage right for Yerevan municipal elections on September 17 was 823,559.



To secure their right to participate in Yerevan municipal elections, the deadline for getting registered as RA citizens was March 18, 2023. "Akanates" mission sent an information request to the Migration and Citizenship Service of the Ministry of Internal Affairs inquiring data (quarterly) on all those persons who were re-registered in Yerevan from the regions of Armenia and Republic of Artsakh between January 1, 2022 and March 23, 2023. Analysis of the provided¹ data identified a number of statistical anomalies, more specifically outlier numbers of registration of persons relocated from particular regions of Armenia to Yerevan more intensively in the given months (quarters). Our mission made these [findings](#) public.

The Migration and Citizenship Service of the Ministry of Internal Affairs sent an official letter to "Akanates" Observation Mission on September 14, 2023 where it clarified that the information system of the state population register was maintained by an outsourced company which "had provided data with a technical error caused by an erroneous shift of the numbers of people in the row of regions due to which there was a mismatch between regions and numbers." We also received the corrected data corresponding to our inquiry, the repeat analysis of which did not identify any outstanding issues.

Problematic addresses

"Akanates" examined the voter lists published 40 days before Yerevan municipal Election Day at www.police.am, as is required by law. Our attention was caught by 50 addresses with abnormal numbers of people registered in them, a total of 3,829 with roughly 76 voters per address on average. The actual number of people registered in these addresses ranged from 42 to 217.

10 of these addresses, the largest number with outliers, were found in Center and Nork-Marash districts of Yerevan, with the least address outliers identified in Arabkir and Ajapnyak districts (2 in each). The largest number of registrants in a given address was identified in Qanaqer-Zeytun with 217 registrants. It is notable that examination of the 6 outlier addresses

¹ The data also include persons under the age of 18.

in this district identified an average of 97 registrants per address. With the average number of outlier registrants, Qanaqer-Zeytun comes second after Avan district, where our examination of the 4 address anomalies showed that on average 118 voters were registered in each of these addresses.

Administrative District	N of addresses with more than 50 registered voters	Total number of outlier registrants	Average N of voters per outlier address
Ajapnyak	2	94	47
Arabkir	2	106	53
Davtashen	3	192	85.93
Nor Nork	3	207	68.25
Avan	4	475	118.75
Erebuni and Nubarashen	5	326	65.2
Qanaqer-Zeytun	6	584	97.33
Malatia-Sebastia	7	658	89.75
Shengavit	8	126	87.9
Center and Nork Marash	10	570	78.86
Total	50	3829	76

The on-site inspection of these addresses by "Akanates" observers showed that some of them are care/health centers and communal houses (dormitories), which could explain the complication of conducting a more detailed registry. There were also addresses where reportedly registration was preferred for business (entrepreneurial) and other domestic purposes. The registry of a large number of persons at the address of the Football Federation of Armenia, its specialty shop and various football clubs was explained by the need of registering football-players invited from abroad.

Nonetheless, we received no reasonable explanation for a couple of suspicious outlier addresses. For example:

- 159 voters were registered at Malyan St. lane 4-39, which is the address of Nork cemetery,
- Shirak Ozh. tnt. 447, Odanavakayan 50 and Tairov St. 46, which are barren lands with no residential facilities where respectively 71, 66 and 171 voters were registered.

It is important to highlight that the issue of registering large numbers of voters per address has been repeatedly voiced by election monitors since 2012 after all the national elections, however the Police of Armenia has not adequately addressed it up to date.

3. Election Campaign

General environment

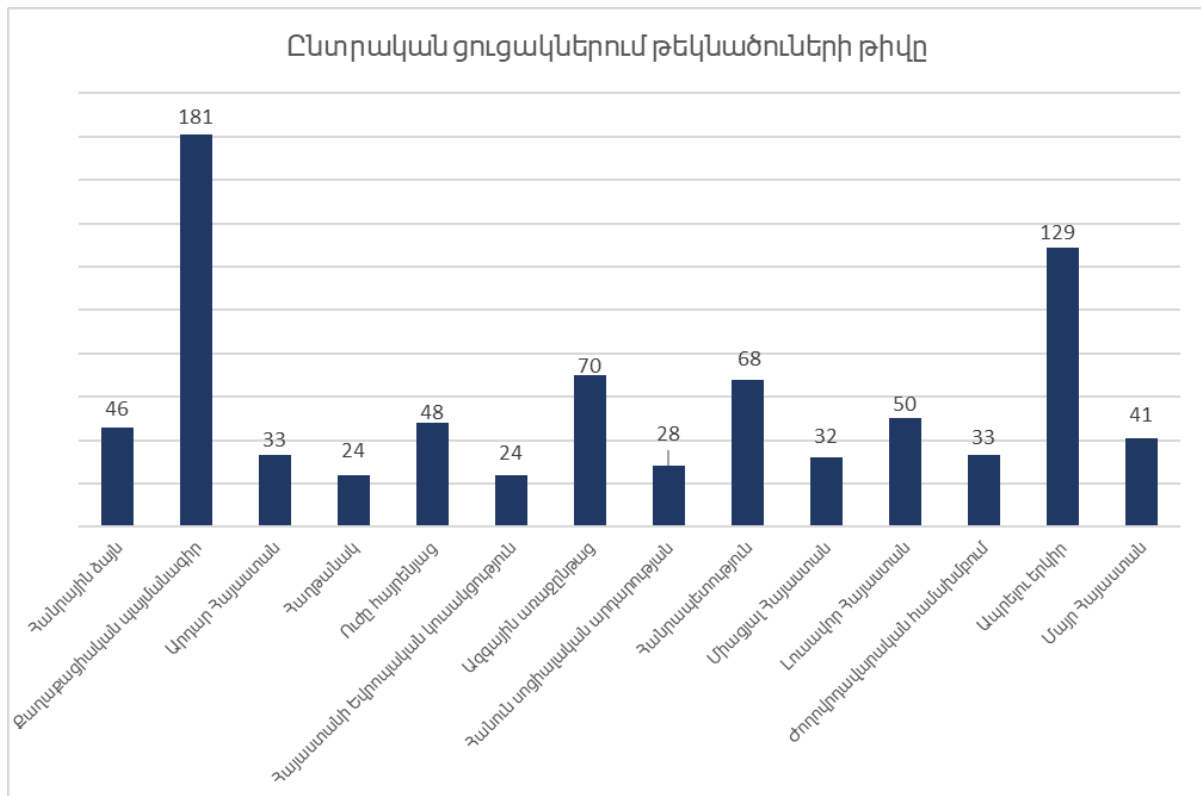
"Akanates" observers conducted numerous meetings with the residents of Yerevan districts. A total of 310 meetings were held with 563 persons. During these conversations, the residents voiced about the dismal condition of residential backyards, lack of green spaces, their discontent with waste disposal. They also complained that they were promised many promises before every election, however afterwards nothing would be done in a proper manner and that they "no longer had hope that anything meaningful will change after these elections." These sentiments of apathy may have affected the low turnout on Election Day.

Residents report that the election campaign proceeded in a calm and peaceful environment. However there were certain circumstances that created tensions in the election campaign, more specifically security threats on the border of Armenia, disinformation, counter-campaigns waged by fake users and pages, as well as insults and personal labeling that have become business usual in political contestation. Many of the residents we have talked to were also worried about the large-scale misuse of administrative resources and pointed out that the high rates of repairs and construction projects launched right before the elections were a proof of that.

Party/Alliance lists

13 parties and 1 alliance ran for Yerevan municipal elections with a total 807 council-member candidates (for around 800.000 voters registered this makes 1 candidate from every 1000 voters).

The Electoral Code specifies that for a municipal council comprised of 65 members, the party/alliance list may contain a maximum of 195 and a minimum of 22 candidates. "Civil Contract" party's list fell short of the maximum by only 14 candidates, running with 181 candidates, with "Country to Live" coming next with 129 candidates, "National Progress" with 70 candidates and "Republic" with 68 candidates. 24 candidates, with only 2 candidates exceeding the minimum threshold, ran in the lists of "Victory" party and "European Party of Armenia."



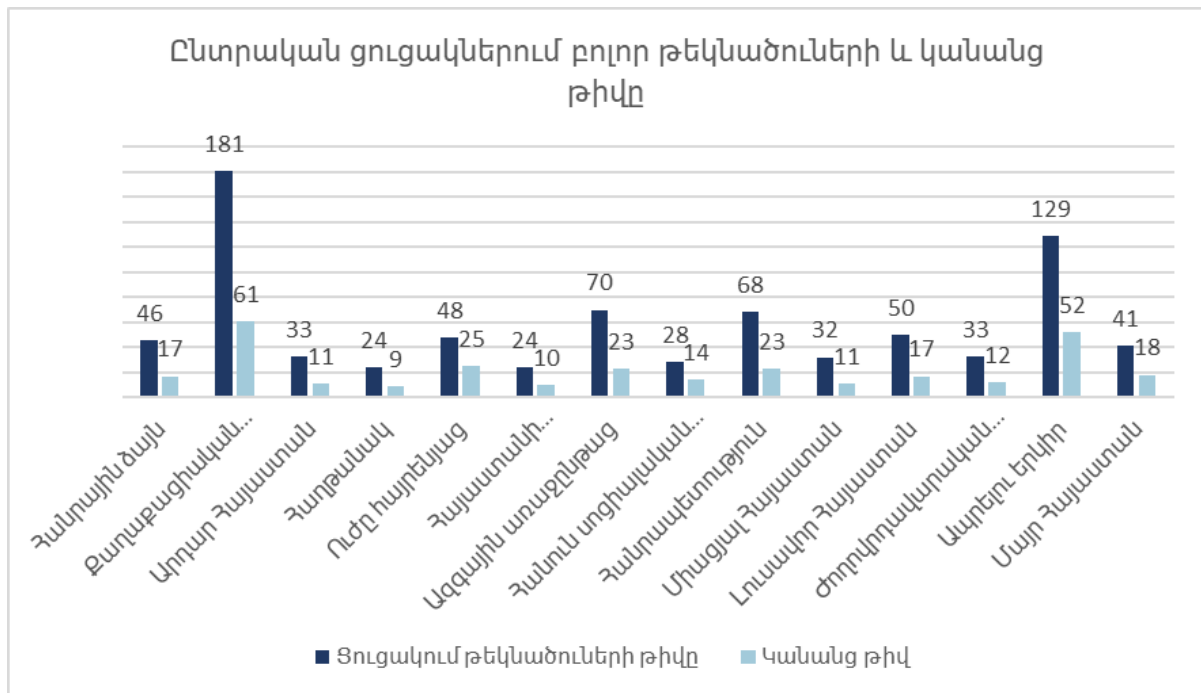
Gender representation in the party/electoral lists

Article 130, Part 2 of the Electoral Code of Armenia stipulates that the number of representatives from each gender shall not exceed 70% in every sequential three numbers of the list, starting with number one.² However, there are no regulations for situations when a gender gap emerges from the self-recusal of persons from a given gender. These cases may dramatically change gender representation after the distribution of elected mandates.

Men comprised 61% and women 39% of the total party lists contesting in Yerevan municipal elections. The way women were first enrolled and later on redistributed in these lists somehow indicates the extent to which their enrolment was a formality.

The proportionality of gender distribution in party lists was most skewed in "National Progress" party list, where men comprised 67.14% and women - 32.86% of the list. Relatively proportional were the lists of 4 of the 14 contesting political forces – "Homeland Power", "For Social Justice", "Country to Live" and "Mother Armenia" Alliance. It is notable that women held higher positions in every sequential troika (numbers 1-3, 4-6, 7-9 etc.) of the lists of these parties/alliance. Women were listed in the third place of each sequential troika in the lists of the other parties. This showed that women's enrolment was merely done to meet the legal requirement.

² Women comprise 52.7% of Armenia's population. National Statistical Service of RA, Permanent Number of Population, <https://armstat.am/am/?nid=12&id=19001&submit=%D5%93%D5%B6%D5%BF%D6%80%D5%A5%D5%AC>; Permanent Number of Population, Women <https://armstat.am/am/?nid=12&id=19003&submit=%D5%93%D5%B6%D5%BF%D6%80%D5%A5%D5%AC>



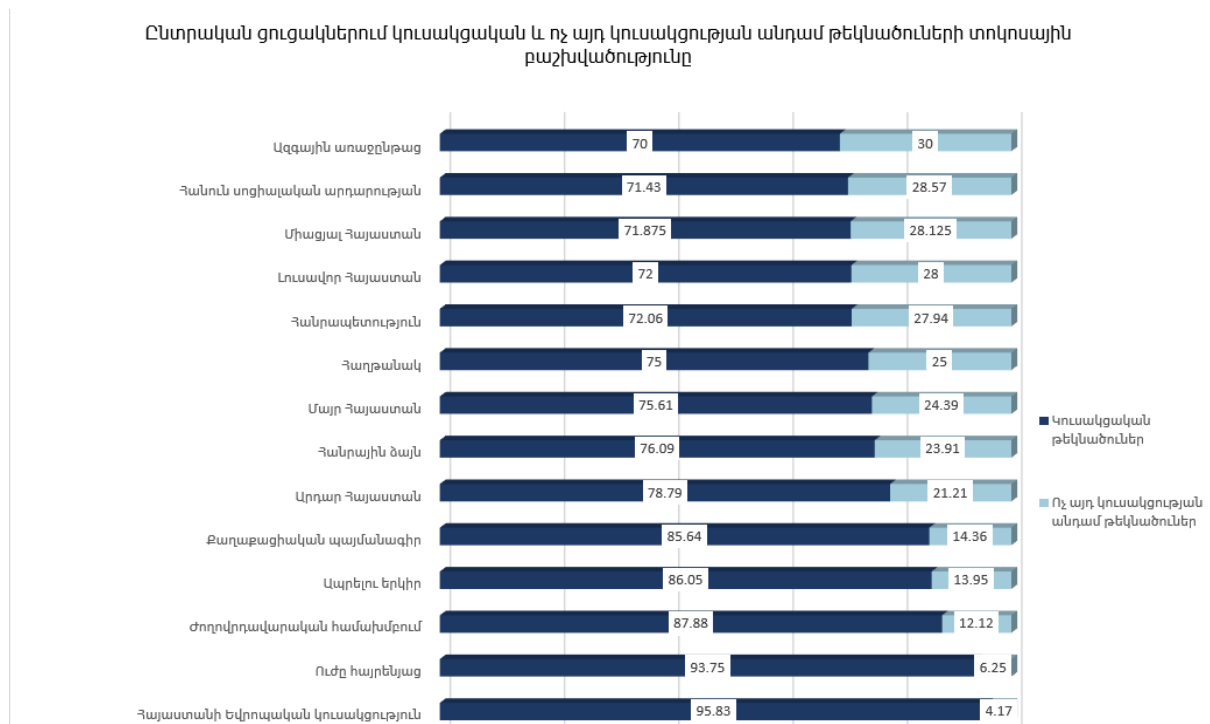
"Homeland Power" was the only party whose party lists were predominantly comprised of women. Women led the party lists of "Homeland Power" and "Country to Live in" parties.

Non-party member candidates

Article 130 of the Electoral Code states that party (alliance) lists may also include non-party members, whose *տոնալ* number shall not exceed 30% of the total number of candidates enrolled in the list.

Party-member candidates comprised 79.4% and non-members – 20.5% of electoral lists.

"European Party of Armenia", followed with "Homeland Power" and "Democratic Mobilization" party had the highest enrolment of party members. "National Progress" had the highest number of non-party members in its electoral list.



Non-party members comprised 23.91% of the "Public Voice" party list. This party, however, enrolled persons from another party – "Alliance" – into its list who occupied spots number 2, 9 and 11. Tigran Ulikhanyan (number 2 in the list) heading "Alliance" party regularly made public statements about bidding for Yerevan municipal elections as an alliance of two parties.³ In reality, "Public Voice" and "Alliance" did not formally make an alliance, however they participated in Yerevan municipal elections in the logic of an alliance. This allowed them to compete under more favorable conditions, bypassing the 6% threshold of total votes, and instead enjoying the 4% threshold.

At certain phases of the election campaign, the number of non-party members enrolled in the list of "National Progress" party exceeded the maximum threshold of 30%, which was due to the self-recusal of two party-members.

"Akanates" Observation Mission sent information requests to all the competing political forces with questions about the formation and approval of candidate lists, the principles and criteria for forming these lists, as well as democratic mechanisms applied within party procedures. With the exception of "European Party of Armenia", none of the contestants responded to our inquiry. We find this quite problematic, especially when it comes to "Civil Contract" and

³ "We are now discussing the candidate list for Yerevan municipal elections. By the way, here is a message for all those entities sending out various warnings, we are definitely going as an alliance with Public Voice, definitely as the only real oppositional alliance. No matter how hard you try to make us "fail", Vardan Ghukasyan will definitely participate in the elections. Yes, these elections in the capital city are going to be between Turks and Armenians and yes, our only key pledge is to kick CC out of Yerevan and take over complete power." <https://www.facebook.com/UrikhanyanTigran/posts/pfbid034LWhRfsJpouXcJXCSiU5KJJ7ihH5YBMsPyYQXmi6qCpuea6ffndtJqKs8bEEpDv8I> "We have made a decision to participate in Yerevan elections. As head of "Alliance", I have had long discussions with politically prosecuted Artak Galstyan, President of "Public Voice". We have one common idea ... to form a broad alliance and to kick out those power-holders..." <https://mediahub.am/post/989a9e0468cbcab97fbclid=IwAR1az1zxXOIU2X1v-69atWVHM-lwgPIJpmpt4WRHn0ITx1nvgeclldZAIso>

"Republic" parties which are funded from the state budget and which therefore violated the "Law on Freedom of Information."

Campaign Pledges

"Akanates" mission, together with several civil society organizations concerned with Yerevan urban management issues, compiled 45 questions for contesting parties. We hoped that with the help of these questions, they would pay attention to these pressing issues and would reflect respective solutions in their campaign programs (pledges).



45 հարց Երևանի ընտրություններին մասնակցող քաղաքական ուժերին¹

Հարցեր ²	1 ՀԶ	2 ԲԴ	3 ԱՀ	4 Հ	5 ՈՒՀ	6 ՀԵ	7 ԱԱ	8 ՀՍԱ	9 ՀԿ	10 ՄՀԿ	11 ԼՀ	12 ԺՀ	13 ԱԵ	14 ՄՀԳ
1. Քաղաքի պլանավորման փոխում, համաչափ զարգացում	0	2.2	1.0		0.8	1.8	3.2	0	0	1.0	1.0		2.2	0.2
2. Հանրային գերակա շահի բացառիկության ապահովում	0	0	0		0	0	0	0	0	0	0		0	0
3. Գլխավոր պլանի/հատակագծի պահպանում	0.6	0	1.4		1.2	0.8	1.6	0	0.6	0.8	0		2.4	0
4. Պատմամշակութային շենքերի վերականգնում	0	0	0.4		0	0	0	0	0.8	0	0		0	0
5. Պատմամշակութային միջավայրի վերականգնում	0	0.2	1.0		0	0	0	0	1.6	0	0		1.4	0.2
6. Նորահայտ հուշարձանների պահպանում	0	0	1.0		0	0	0	0	1.0	0	0		1.0	0
7. Հուշարձանների ցանկի ընդլայնում	0	0	0.4		0.6	0	1.2	0	0	0	0		1.8	0
8. Կանաչ տարածքների շինություններից մաքրում	0.6	0.4	1.4		1.8	0.8	3.8	0.2	1.0	1.6	0		3.2	1.2
9. Քաղաքը շրջապատող լանջերի կանաչի վերականգնում	1.2	2.2	0		1.8	0	0.2	0	0	0	1.4		3.0	0
10. Նոր կանաչ գոտիների ստեղծում	0.8	1.8	0.6		1.4	0	3.4	0	1.6	0	0		2.8	0
11. Մասնավոր փոխադրամիջոցների քանակի նվազեցում	0.8	1.4	2.2		1.0	2.6	0	1.0	2.8	0	1.2		0	0
12. Հանրային տրանսպորտի մատչելիության ապահովում	0.2	1.0	0		1.0	1.4	1.6	1.8	1.2	1.2	0		2.6	1.2
13. Հանրային տրանսպորտի կազմակերպում	1.6	2.8	1.8		1.2	0	3.0	0	2.0	0	0		3.4	1.6
14. Գլխ. պլանով նախատեսված ճոպանուղու և մետրոյի կառուցում	0	2.0	1.2		0	2.6	0	1.6	1.6	0	0		3.0	0
15. Մասնավոր տաքսիների հաշվիչների, աղմուկի կարգավորում	0.6	0	0		0	0	0	0	0	0	0		0	0
16. Հեծանվուղիների ավելացում	1.2	1.0	0		2.2	0	1.0	0	2.0	1.2	0		2.8	0
17. Կայանատեղիների կազմակերպում	2.0	0	1.4		0	0	0	1.2	0	1.4	1.8		2.2	1.2
18. Մթնոլորտային արտանետումների նվազեցում	2.0	2.4	0		2.2	1.2	0	0	1.8	0.8	0		2.2	0.2
19. Մանկապարտեզների ապահովում	1.0	3.8	0		1.8	0	1.0	1.2	1.4	1.2	0		2.2	0.2
20. Պոլիկլինիկաների սպասարկման կարգավորում	1.2	2.0	1.4		1.8	0	3.0	1.2	1.4	1.0	0		3.0	0.8
21. Բազմաբնակարան շենքերի խնդիրների լուծում	0	1.6	0		0.8	0	2.6	0	1.2	0.2	0.8		1.0	0
22. Գերեզմանների մակերեսի ընդլայնման կանխում	0	0	0		0	0	0	0	0	0	0		0	0
23. Գերեզմանատների կառավարում, բարեկարգում	0.6	0	0.6		0	0	0	0	0	0	0		2.0	0
24. Այցելու չունեցող գերեզմանների խնամք	0.6	0	0		0	0	0	0	0	0	0		0	0

25. Աղբոտման/աղտոտման կանխարգելում	1.4	0	0.8		2.6	1.0	2.8	0.4	0.4	0	0		0	0
26. Քաղաքի մաքրման համակարգի կազմակերպում	1.4	0.4	0		0	1.2	3.2	0	1.8	0	1.6		3.2	1.4
27. Աղբի տարանջատում, վերամշակում	0	2.2	0.2		0	0	0.6	0	1.6	0	0		0	1.2
28. Պատշաճ ստանդարտներով աղբավայրի ապահովում	2.4	1.6	1.4		0	0.8	2.4	0	1.0	0.8	0		1.6	0.2
29. Թափառող կենդանիների հարցի կարգավորում	1.6	1.8	1.8		0	2.6	0	0	1.2	0	0		2.0	0
30. Տնային կենդանիների պատասխանատու խնամքի խթանում	0	2.6	0		0	0	0	0.8	0	0	0		1.8	0
31. Պատասխանատու ընդերքօգտագործման խթանում	0	0	0		0	0	0	0	0	0	0		0	0
32. Հանքարդյունաբերության արդյունքում ծագած խնդիրների լուծում	0	0	0		0	0	0	1.0	0	0	0		0	0
33. Լքված հանքերի ռեկուլտիվացիայի ապահովում	0	0.2	0		0	0	0	0	0	0	0		0	0
34. Գնումների մրցակցայնության ապահովում	0	0	0		0	0	0	0	0	0	0		0	0
35. Կոռուպցիայի արդյունքում ընդունված որոշումների վերանայում	0	0	0		0	0	0	0	0	0	0		0	0
36. Կապալառուների ընտրության չափանիշների խստացում	0	0	0		0	0	0	0	0	0	0		0	0
37. Մասնավորից բարեգործության ընդունում	0	0	0		0	0	0	0	0	0	0		0	0
38. Լեզվաբաղադրականության իրականացում	0	0	0		0	0	0	0	0	0	0		0	0
39. Պաշտոնյաների և ծառայողների բարեկարգության ապահովում	1.2	0	1.6		0	0	0	0	0	0	0		0	0
40. Պաշտոնյաների կամայականությունների բացահայտում	0.2	0	0		0	0	0	0	0	0	0		0	0
41. Ավագանու ծախսերի հաշվետվողականության ապահովում	0	0	2.0		0	0	0	0	0	0	0		0	0
42. Քաղաքապետարանի հաշվետվողականության ապահովում	0	0	0		0	1.4	0	0	0	0	0		0	1.2
43. Քաղաքի գործընթացում հանրային մասնակցության ապահովում	0	0	0		2.4	1.0	3.0	0	1.4	2.0	0		1.2	2.2
44. Ավագանու աշխատանքներին հանր. մասնակցության ապահովում	0	0	0		0	0	0	0	0	0	0		0	0
45. Միջազգային լավագույն փորձի որդեգրում	0	0.2	0		0	0	0.2	0	0	0	0		0	0

¹ Աղյուսակի տողերում ներկայացված են հասարակական կազմակերպությունների կողմից երևանի ընտրությունների մասնակցող քաղաքական ուժերին տրված հարցերը, իսկ սյուներում՝ վերջիններիս հերքական համարները: N1 «Հանրային ծախս» կուսակցություն, N2 «Քաղաքացիական պայմանագիր» կուսակցություն, N3 «Արդար Հայաստան» կուսակցություն, N4 «Հաղթանակ» կուսակցություն, N5 «Ուժից հայրենյաց» կուսակցություն, N6 «Հայաստանի եվրոպական կուսակցություն, N7 «Ազգային առաջնաց» կուսակցություն, N8 «Հանուն սոցիալական արդարության» կուսակցություն, N9 «Հանրապետություն» կուսակցություն, N10 «Միացյալ Հայաստան» կուսակցություն, N11 «Լուսավոր Հայաստան» կուսակցություն, N12 «Ժողովրդավարական համախմբում» կուսակցություն, N13 «Ապրելու երկիր» կուսակցություն, N14 «Մարդ Հայաստան» դաշինք:

² Մրցակցող կուսակցություններին մեկ դաշինքի ծրագրերը (ըստառության՝ N4 «Հաղթանակ» կուսակցության և N12 «Ժողովրդավարական համախմբում» կուսակցության, որոնք ծրագրեր չեն ներկայացրել) նշված ոլորտների միջոցառումների տեսակներով ցանկացվել են 5 անկախ փորձագետների (2 քաղաքաշինության, 1 շրջակա միջավայրի, 1 տեղական ինքնակառավարման փորձագետներ և 1 սոցիոլոգ) խմբի կողմից՝ 0-4 աստիճանով, որտեղ 0 - որևէ անդրադարձ չկա, 1 - կա թույլ ինքնակառավարման, 2 - ներկայացված է համառոտ առաջարկ, որը տակայն ընդլայնվում է, չի լուծվում ամբողջ խնդիրները, 3 - ներկայացված է լուծման համառոտ առաջարկ, որը զարգացնելու պարագայում հնարավոր է լուծի ամբողջ խնդիրները, 4 - ներկայացված է մանրամասն և պատշաճ լուծում: Աղյուսակի վանդակների գումարումները համապատասխանում են միջինացված փնդակների միջակայքերին՝ 0, 0-0.9, 1.0-1.9, 2.0-2.9, 3.0-4.0:

Of all the political forces, only "Bright Armenia's" (Lusavor Hayastan) Davit Khazhakyan reacted to the proposals of civil society in a [livestreamed address](#). The other contestants left our questions without an answer.

In the backdrop of regulations not requiring a mandatory availability of a campaign program, "Victory" and "Democratic Mobilization" parties did not present a program with campaign pledges at all. The programs of the rest of the political forces were analyzed by a group of independent experts⁴ with a view to identify whether or not they addressed the above-mentioned 45 questions.

Campaign offices

⁴ 5 independent experts (specialized in urban development, ecology, sociology, local self-governance) evaluated the programs on a scale from 0-4, where 0 means that there is no mentioning of the issue in the program, 1 – there is a cursory mentioning, 2 – there is a brief suggestion lacking relevance as the suggestion does not address the issue, 3 – a brief suggestion is proposed which may address the issue if it is properly developed, 4 – a detailed solution is adequately proposed.

"Akanates" has sent information requests to all the political forces competing in Yerevan municipal elections to find out the addresses of their campaign offices, either existing ones or those planned specifically for these elections, as well as to learn about the type of titles for these spaces (property rights, rental, free use etc.). None of them responded to our inquiry. This has also meant that "Civil Contract" and "Republic" parties financed by the state budget have violated the requirement of the "Law on Freedom of Information", which stipulates that all organizations financed by public financing are holders of information under the regulations of the law.

During observations, our observers visited 82 campaign offices and collected information on the issues they observed, about the office spaces, campaign workers etc. With the exception of 10 campaign offices of "Civil Contract" located in Shengavit and Malatya districts, it was possible to hold interviews with office coordinators and obtain ample information.

Campaigning

The Electoral Code (Article 19) grants opportunities and rules for parties and alliances running for elections to use public resources, promote their campaign and ensure financial transparency during the time period designated for campaigning. These rules also restrict misuse of administrative resources (as stipulated by Article 23).

The official campaign period for the 2023 September 17 Yerevan municipal elections started on August 23, 2023 and ended on September 15 at 24.00.

"Akanates" observers participated in around 110 campaign events, held 32 meetings with the representatives of the administrative regions, 35 meetings with representatives of the police, mass media and local observers.

Campaign methods and tools

The competing political forces employed a multitude of campaign modalities. The most active and eye-catching campaign strategies were applied by "Civil Contract" and "Country to Live" parties, while the most invisible and passive campaign can be attributed to the "European Party of Armenia."

ԶԱՆԴԱՔԱԿԱՆ ՈՒԺ	ԿԻՐԱՌՎՈՂ ԶԱՐՈՂԱՅԻՆ ԳՈՐԾԻՔՆԵՐ										
	Հանրահավաք	Քայլերթ	Բակային հանդիպումներ	Ավտո-երթեր	Հանրային քննարկում	Գովազդային վահանակ	Պաստառ/թուղթ/բուկետ	Համացանցային գովազդ	Անցացվող քարոզչականություն	Վճարովի եթերա-ժամանակ	Անվճար եթերա-ժամանակ
1. Հանրային ծայն			x			x	x	x			x
2. Քաղաքացիական պայմանագիր	x	x	x			x	x	x	x	x	x
3. Արդար Հայաստան			x			x	x				x
4. Հաղթանակ			x			x	x				x
5. Ուժը հայրենյաց			x	x		x	x	x	x		x
6. Հայաստանի եվրոպական կուսակցություն						x					x
7. Ազգային առաքելության			x			x	x	x		x	x
8. Հանուն սոցիալական արդարության			x	x		x	x				x
9. Հանրապետություն	x		x			x	x	x		x	x
10. Միացյալ Հայաստան			x			x	x			x	x
11. Լուսավոր Հայաստան			x			x	x			x	x
12. Ժողովրդավարական համախմբում			x			x	x				x
13. Ապրելու երկիր		x	x		x	x	x	x	x	x	x
14. Մայր Հայաստան	x	x	x			x	x	x		x	x

Campaign costs
















The analysis of declarations made available on the webpage of CEC's [Oversight and Audit Service](#) on deposit payments made onto the campaign funds of parties/alliances and the way these financial means were used, shows that 563 mln AMD were deposited onto the campaign funds altogether, however the actual costs amounted to 557 mln AMD. "Civil Contract" declared 299 mln AMD – the highest amount of deposits made onto its campaign foundation account and expended. That is more than half of the total amount of finances declared by all other competing forces, whose subtotal financial costs (incomes) fall short of the ones spent by "Civil Contract" by 40 mln AMD. The "European Party of Armenia" declared 0 income and costs.

Political force	Campaign fund deposits (AMD)	Campaign fund expenditures (AMD)
Public Voice	5,041,100.0	5,035,560.0
Civil Contract	299,377,440.0	298,618,899.0
Fair Armenia	4,610,000.0	4,104,600.0
Victory	950,000.0	928,200.0
Homeland Power	32,400,000.0	32,389,600.0
European Party of Armenia	0	0
National Progress	10,432,500.0	9,114,144.0
For Social Justice	250.000	230.000
Republic	32,972,600.0	32,972,600.0
United Armenia	6,980,000.0	6,924,820.0
Bright Armenia (Lusavor Hayastan)	14,700,000.0	14,698,433.0
Democratic Mobilization	11,350,000.0	11,333,840.0
Country to Live	91,093,000.0	88,414,110.0
Mother Armenia	52,409,500.0	52,105,576.0
Total	562,566,140.0	556,870,382.0
Average	40,183,295	39,776,455

The comparison of campaign expenditures by each political force and the votes they received shows that, on average, altogether, the parties spent 3,747 AMD per vote. "Homeland Power" and "Country to Live" spent the highest amount per vote - 19.000 AMD and 10.500 AMD respectively.

It is noteworthy that "Civil Contract's" campaign was boosted by the use of administrative resources, including the supplemental funds provided from the state budget for at least the

following programs – modernization of apartment complex building elevators, repairs of roads, repairs, reconstruction or beautification of parks and recreational areas.

«ՀԱՆՐԱՅԻՆ ՁԱՅՆ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	224.5	
«ԶԱՂԱԶԱՅԻԱԿԱՆ ՊԱՅՄԱՆԱԳԻՐ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	3957.2	
«ԱՐԴԱՐ ՀԱՅԱՍՏԱՆ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	1581.7	
«ՀԱՂԹԱՆԱԿ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	252.1	
«ՈՒԺԸ ՀԱՅՐԵԼՅԱՑ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	18985.7	
ՀԱՅԱՍՏԱՆԻ ԵՎՐՈՊԱԿԱՆ ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	0.0	
ԱԶԳԱՅԻՆ ԱՌԱՋԸՆԹԱՑ ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	208.3	
«ՀԱՆՈՒՆ ՍՈՑԻԱԼԱԿԱՆ ԱՐԴԱՐՈՒԹՅԱՆ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	294.9	
ՀԱՆՐԱՊԵՏՈՒԹՅՈՒՆ ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	1256.8	
ՄԻԱՑՅԱԼ ՀԱՅԱՍՏԱՆ	5401.6	
«ԼՈՒՍԱՎՈՐ ՀԱՅԱՍՏԱՆ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	3521.4	
«ԺՈՂՈՎՐԴԱՎԱՐԱԿԱՆ ՀԱՄԱԽՄԲՈՒՄ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	4827.01	
«ԱՊՐԵԼՈՒ ԵՐԿԻՐ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆ	10494.26	
«ՄԱՅՐ ՀԱՅԱՍՏԱՆ» ԿՈՒՍԱԿՑՈՒԹՅՈՒՆՆԵՐԻ ԴԱՇԻՆՔ	1457.95	
ՄԻՋԻՆ	3747.4	

In the meanwhile, this analysis indicates that the efforts and financial means exerted by political forces did not match their desired expectations, as voter orientation and decisions were influenced by other factors.

Irregularities related to campaign advertisements

Many irregularities were observed in relation to dissemination of campaign promotional materials. Our Observation Mission took note of 30 cases when information on print volumes and printing house was missing in the promotional materials of "Civil Contract" party. 26 similar cases were noted in relation to "Homeland Power" and 24 cases in relation to "Country to Live".

The leaflets of the party "For Social Justice" did not have any markings on the volume of print and printing house. "United Armenia" alliance and "Homeland Power" party did mark the volume of print, but not the printing house. We took note of 5 cases when the posters by "Mother Armenia" did not contain information on the print volume and printing house.

Irregularities related to dissemination of campaign advertisements

The sites designated by the community free of charge for dissemination of campaign ads were predominantly filled with the posters of "Country to Live" and "Civil Contract" parties, often occupying the entire space for free campaign posters and leaving no vacant spaces for any other promotional materials.

The Electoral Code obliges companies that manage outdoor advertising billboards to make sure that banners/billboards feature political ads in a non-discriminatory and non-biased manner. This requirement, however, is only of a declaratory nature and is not enacted in real life. We have noted excessive concentration of a single political force's paid promotional ads in various parts of the city, often installed together with associated materials. We have noted the most frequent excessive concentration of the campaign ads in relation to "Civil Contract", "Country to Live" and "Homeland Power" parties predominantly in Center and Arabkir administrative districts. For example, on the right side of the road adjacent to Hrazdan Stadium leading up to Brazil Square, "Civil Contract" had 20 banners with no other party's banners in the vicinity.

These three parties also stood out with the volume of campaign ads glued in banned sites. Our observers took note of 55 such cases in relation to "Civil Contract", 43 cases – to "Country to Live" and 33 cases – to "Homeland Power". Much less, around 4-5 cases were observed in relation to "Republic", "Democratic Mobilization", "Fair Armenia", "National Progress" parties and "United Armenia" alliance. The ads were seen glued on outer walls of apartment complex buildings, the inner and outer parts of their entrances, on the glasses of grocery shops, kiosks and other shopping sites, on street light poles.

Article 21, Part 3 of the Electoral Code requires that the community head designate sites within the community (with the exception of public school territories) for the free dissemination of campaign posters, other kinds of printed ads and materials ensuring such conditions that all the candidates running for a mayor or municipal council member, including the parties enjoy equal opportunities (equal space) for using these sites. For communities with a population above 10,000, the community head's decision on designated sites is presented to the Central Electoral Commission, which publishes it on its website.

The [irregularities](#) recorded by "Akanates" indicate that there is no methodology for ensuring enforcement of the provision on designating equal opportunities (equal space). Also, there are no tools for effective oversight over such enforcement.

When "Akanates" requested clarifications from CEC on this issue, the response was that the DEC regularly walk around the administrative districts and if they notice irregularities, they immediately inform the local self-government bodies to alert them to take respective measures. In their response, CEC quoted the provision by which this duty is set out. According to it, in the event the campaign advertising rules are violated, DEC turn to the authorized bodies to prevent the violation or issue a warning to the candidate or party that has violated the rules. The reality, however, shows that proper oversight over the implementation of this provision is not carried out.

In [response](#) to another inquiry, CEC confirmed that there was no methodology on how ads were to be equally distributed on surfaces less than 5 square m and how non-discriminatory and equal opportunities for using free campaign ad sites were ensured in practice.

Removal of campaign ads from non-designated sites

In accordance with Article 21, Part 9 of the Electoral Code, the community had is in charge of removing campaign ads that were placed in violation of law. Our mission, however, did not see any active work towards removing such campaign materials.

"Akanates" observers alerted respective DEC's on several dozens of cases of campaign ads glued in non-designated sites and expected that they would take charge of maintaining the letter of the law in the districts under their service, including with the help of local self-government bodies. However, we took note of only rare cases when these ads were removed in a timely manner. Even after removal, they resurfaced in those same banned sites.

Our overall conclusion is that the staff of the administrative districts of Yerevan did not follow up on our alerts, while the response by DEC's was inadequate, except two instances.

Campaigning via mass media

Article 20.1 of the Electoral Code sets out that publicizing of campaign materials must be accompanied with a disclaimer that reads as "Election Campaign Promotion", while the same disclaimer shall be visible during the entire duration of a campaign video commercial. Article 20, Part 13 of the Electoral Code also stipulates that mass media founded by central and local government bodies shall ensure non-discriminatory and unbiased conditions for parties (alliances) running for an election.

Numerous [instances](#) were recorded of promotional materials disseminated without disclaimers and other required information. "Akanates" did reach out to CEC to make sure these irregularities were rectified. However, our follow-up observations showed that the majority of mass media (with the exception of "Aravot" media) continued to disseminate campaign promotions in violation of the requirements of law.

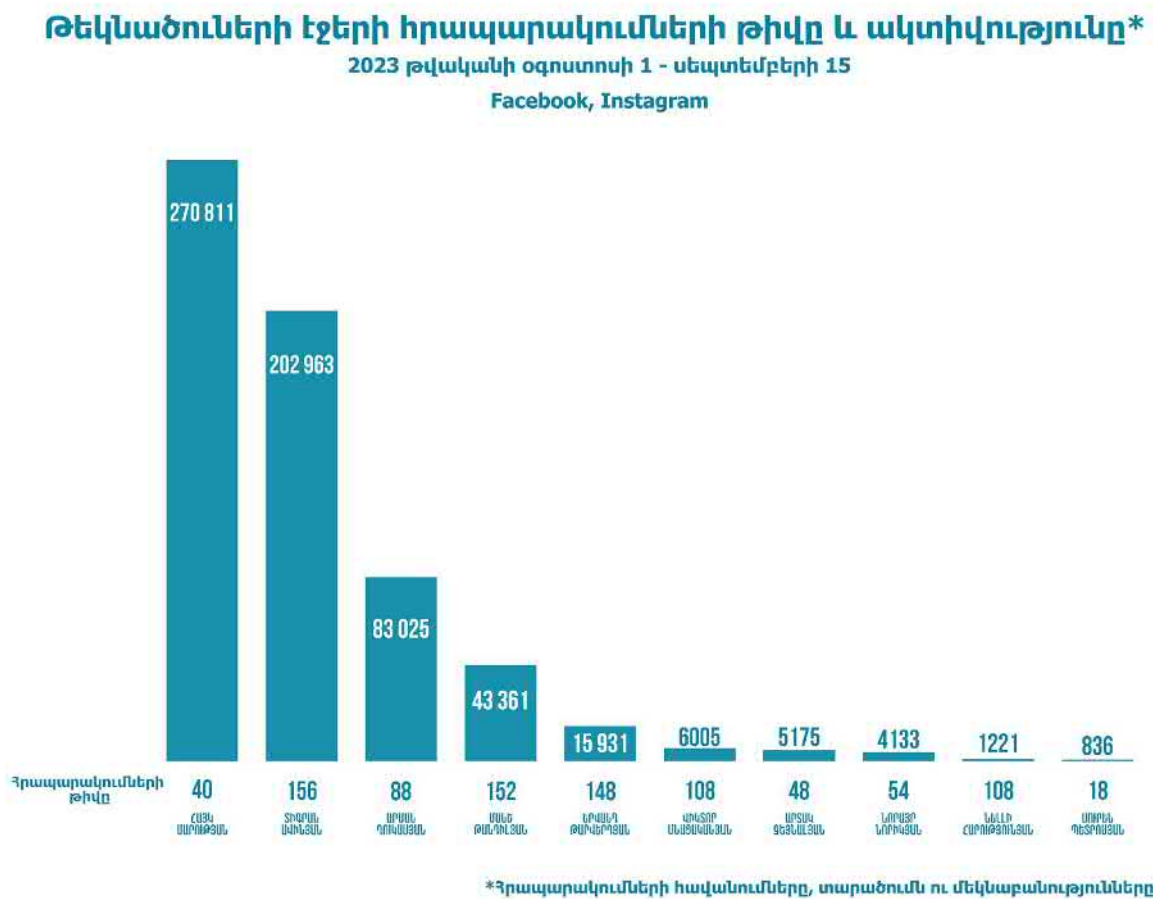
A media outlet founded by "ArmenPress" news agency, a closed joint stock company established by the state (with 100% of state-owned shares), published numerous campaign commercials promoting "Civil Contract" party, in violation of the requirements of law. Upon the alert of "Akanates" mission, the situation was rectified and the political ads were removed.

During the campaign period, Public TV's "Interview with Petros Ghazaryan" show organized two interviews with high officials, first on September 4 with [Ruben Rubinyan](#), Deputy Speaker of the Parliament (around 26 minutes), then on September 11 with Prime-Minister [Nikol Pashinyan](#) (around 60 minutes). A significant part of these interviews count as promotion of "Civil Contract" party for the election campaign and counter-campaign against "National Progress" party, more specifically its front-runner, Hayk Marutyan.

Social Media Campaign

We used *Crowdtangle* to analyze the presence of candidates on social media. The tool showed that the most visible candidates on Facebook and Instagram were Tigran Avinyan, Hayk Marutyan and Mane Tandilyan.⁵ Most frequent posts were made on Mane Tandilyan's page, on average 3.49 per day, followed by Tigran Avinyan – 3.44 posts per day on average. Hayk Marutyan is second to last, with 0.88 posts made on social media per day.

It is noteworthy that while Hayk Marutyan's posts on social media fell behind the rest in their frequency, these posts attracted many interactions with high numbers of likes, shares and comments. For example, only 40 posts made between August 1 and September 15 on Marutyan's page had a total 270,811 likes, shares and comments, while Tigran Avinyan's 156 posts had a total 202,963 interactions, and Mane Tandilyan's post interaction number for 152 posts was 43,361.



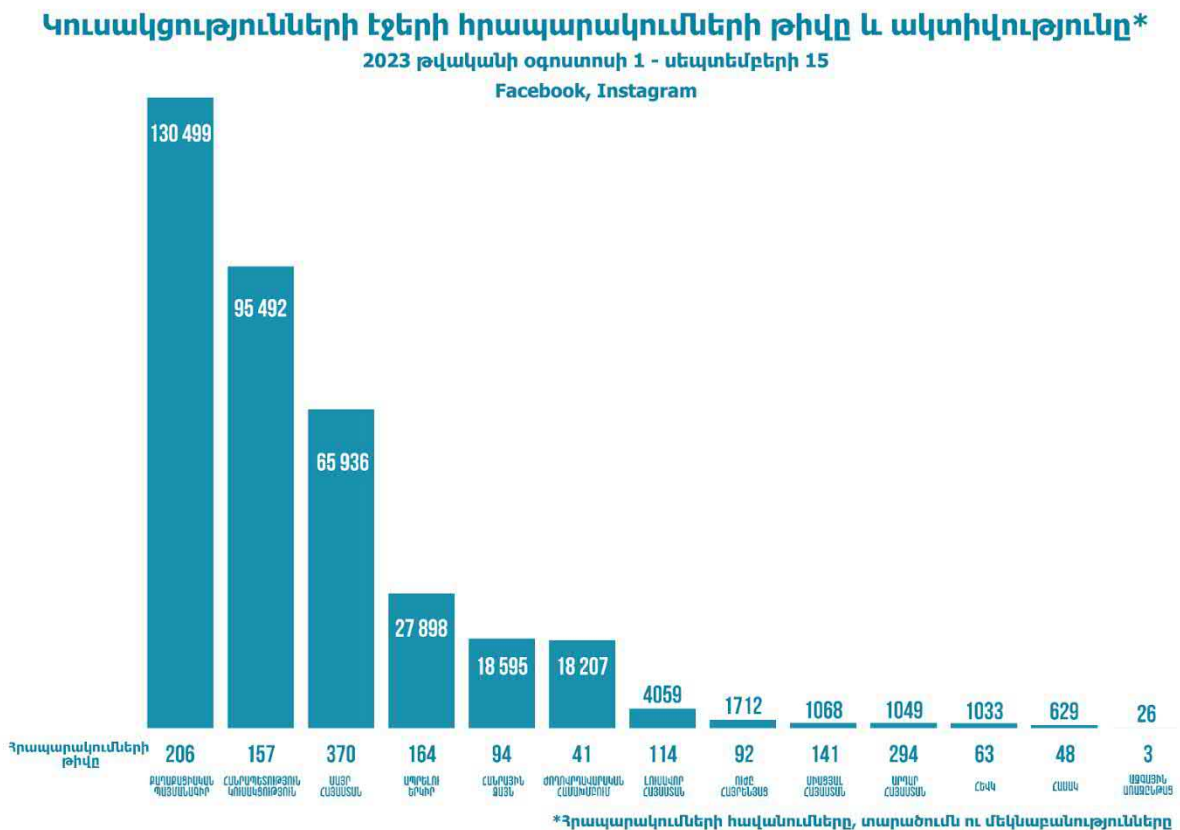
Analysis of the campaign activities on party pages shows⁶ that "Mother Armenia" alliance was the most active party on social media with 370 posts made during the research period. This

⁵ For technical reasons we were unable to analyze "Bright Armenia's" front-runner Davit Khazhakyants' page. Leading candidates of three other parties, Artak Galstyan, Tigran Khzmalyan and Arman Ghukasyan did not have pages on social media, therefore they were not included in the analysis.

⁶ The analysis does not include "Victory" party, as the party did not have any page on the examined social media.

party was followed by "Fair Armenia" with 294 posts and "Civil Contract" with 206 posts in total.

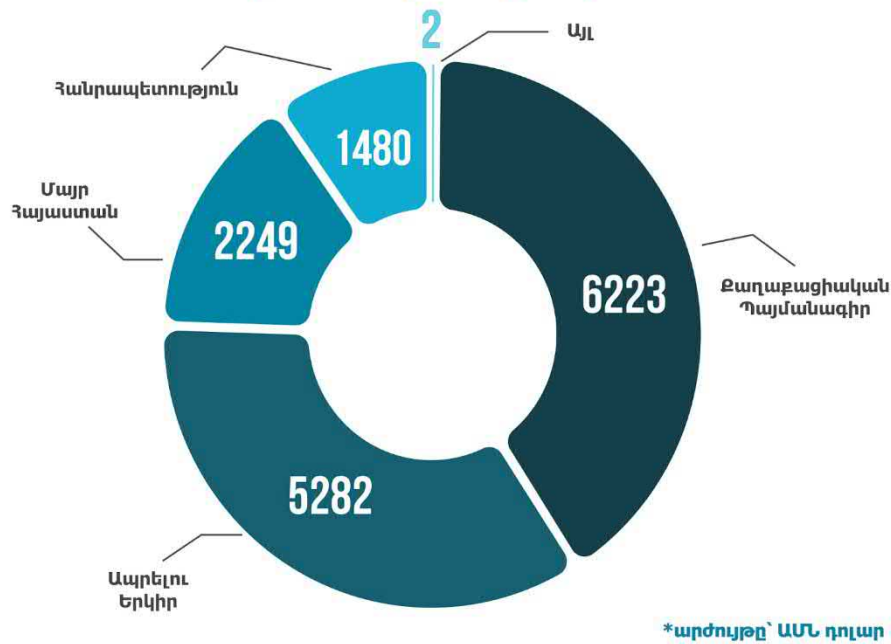
"Civil Contract's" posts attracted most interactions with a total of 130,499 likes, shares and comments. It was followed by "Republic" party with 95,492 interactions. Unlike the active reactions to Hayk Marutyan's posts, "National Progress", the party that endorsed him, had the least interactions to posts on the official party page. This can be explained by a number of factors, however one of the explanations may be that this party's page was relatively passive on Facebook (with 0.7 posts daily on average) and did not promote posts as paid ads.



Meta Ads Library tool showed us that the highest amount of payments for online promotions was made by "Civil Contract" party with 6,223 USD for 20 ads (which had 300,000 – 400,000 impressions).⁷ "Country to Live" spent 5,282 USD for 102 ads (with 25,000 - 35,000 impressions), while "Republic" party spent 1,480 USD for 30 ads (with 80,000 - 90,000 impressions).

⁷ Average number of ad impressions (views on user timelines).

**Կուսակցությունների՝ առցանց գովազդների ծախսերը
(Facebook, Instagram)***

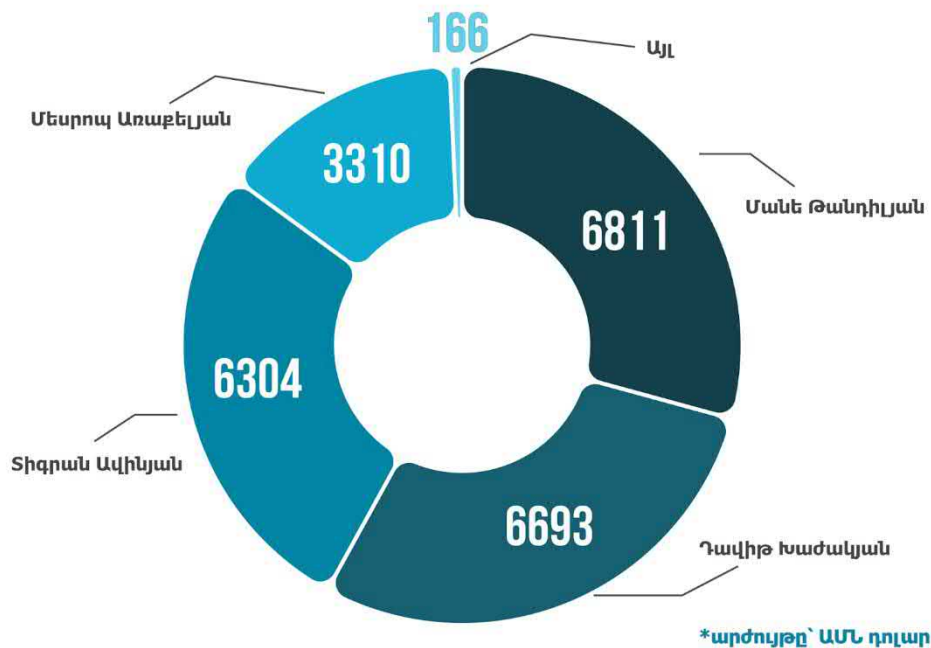


The highest amount of payments for the political ads on the pages of candidates endorsed in the first score (slots 1-20) of parties was made by three political parties. For "Country to Live" party's Mane Tandilyan's page, 6,811 USD were spent for 130 ads (30.000 - 40.000 impressions). Mesrop Arakelyan's page, second after Tandilyan on the party list, had 39 ads with a cost of 3,310 USD (80.000 - 90.000 impression).

"Bright Armenia's" front-runner for Yerevan Mayor, Davit Khazhakyany's page had 49 ads with a cost of 6,693 USD (120.000 - 130.000 impressions).

Tigran Avinyan's page of "Civil Contract" had 57 ads with a cost of 6,304 USD (90.000 - 100.000 impressions). Armen Galjyan's page, running N 7 in the party list, had 4 ads with a total price of 117 USD (50.000 - 60.000 impressions).

Թեկնածուների՝ առցանց գովազդների ծախսերը (Facebook, Instagram)*



While the campaign intensified, clearly fake pages and users started to emerge or intensify in social media. They carried forward an organized counter-campaign against the other competing parties. During our meetings with party representatives, our observers got comments that they would regularly fall victim to fake user and page attacks attempting to discredit them. Various investigative journalists ([CivilNet](#), [Fact Investigation Platform](#)) have touched on the issue in their investigations and have revealed findings that raise concerns specifically in relation to actions committed by "Civil Contract" party.

To validating authenticity of user accounts, "Akanates" has itself examined 700 accounts that were intensively engaged in campaigning in Facebook with a high number of interactions, such as likes, shares and comments. It found out that around 270 of these accounts were fake and were actively participating in the political campaigning by employing various methods, mostly by reacting to various posts with "angry" emojis, by leaving pejorative comments, arguing with other users and expressing their support for or counter-campaign against competing candidates. Engagement of such a high volume of fake users in the "digital campaign" is problematic in terms of campaign integrity and transparency, but also from the perspective of external collusion and impact on the election outcomes.

During campaign silence, campaign promotion or counter-campaign occurred only on the Internet. Campaign promotion was done on social media [pages associated](#) with "Civil Contract", on the official page of "Bright Armenia". Various candidates on party lists and other party members also engaged in campaigning by sharing their party's commercials and associated materials despite the legal requirement of campaign silence. We noticed such posts on the accounts of Vahagn Aleksanyan, Emil Yeremyan, Armen Galjyan, Hrachya Hakobyan and Armen Mheryan from "Civil Contract" party, Aram Sargsyan and Ani Khachatryan from "Civil Contract" party, Grigor Yeritsyan from "National Progress" party,

Hrant Davoyan from "Victory" party, Davit Khazhakyan and Anna Navasardyan from "Bright Armenia" party.

4. Misuse of Administrative Resources

In view of the developments that preceded appointment of municipal elections in Yerevan and Tigran Avinyan's takeover of the post of Yerevan Deputy Mayor who was later endorsed as the front-runner of "Civil Contract" party, and who took hold of leverages of power with his position, administrative resources were widely misused during the election campaign period.

Engagement of heads of administrative districts and their staff in campaigning

The most obvious and coordinated manifestation of misuse of administrative resources was the engagement of employees of the governance bodies of Yerevan's all administrative districts in the political campaigning. Examples include the following:

- During "Civil Contract's" campaign rally on August 24 in Malatia-Sebastia, Sasha Katvalyan, Advisor to Yerevan Mayor and Lazr Khachatryan, Deputy Head of Malatia-Sebastia administrative district, joined the rally while not being on an official leave. In another instance, these same persons were seen in the party's campaign office during working hours.
- "Akanates" observers saw employees of Arabkir and Ajapnyak distributing "Civil Contract's" leaflets during working hours.
- Hrachya Hakobyan, Deputy Head of Davtashen administrative district, acting as Head, regularly took part in the meetings held by "Civil Contract" in residential backyards while not being on an official leave. He also actively made Facebook posts with campaign slogans.
- Gegham Karapetyan, Deputy Head of Arabkir administrative district, as well as other employees of the district administration participated in the campaign rally of "Civil Contract" during working hours.
- The Secretary of the staff of Ajapnyak administrative district, its Deputy Head and the President of "Ajapnyak 7" condominium were seen in Civil Contract's campaign office located on Shinararner St. during working hours.

It is noteworthy that the heads (often their deputies too) of all the administrative districts of Yerevan who were also enlisted in Civil Contract's lists, were on official leaves from work and our observers did not have an opportunity to meet them. Despite being officially on leave, they participated in the daily routine of the administrative district governance and in ceremonial events, also oversaw the repair projects intensively implemented during this period.

The heads and other staff members of the administrative districts regularly (almost daily) visited residential blocks and met with people. By doing so, they combined their roles of municipal council candidates and staff members (heads) of the administrative district and took note of the problems raised by people and attempted to address them, often also trying to find out who people were prone to vote for. During these meetings they repeatedly stressed the position they held, reassured that the "district administration stood by the people" and was there to listen to all their issues.

There were instances in Center, Nor Nork and Shengavit administrative districts when the employees of district administrations and representatives of condominiums participated in surveying public opinion, went door by door asking citizens questions related to their stance on "Civil Contract" and voting decisions.

On September 5, 2023, "Akanates" submitted a request for information to Yerevan Municipality requesting the list of employees of administrative districts who were enlisted in party lists running for the elections and the periods during which they were on leave. The response to this request was only received on October 2023. This delay hampered our Observation Mission's effective scrutiny over the pre-election period.

Yerevan municipality's and administrative districts' social media activities were intensified in the run-up to the elections with aggressive promotion of their daily work. The activeness on social media sharply dropped after the elections. Such a dynamics raises the question of whether the goals pursued by such activeness were legitimate and also indicates that these pages were put at the service of political campaigning and attracting people's votes.

Engagement of employees of educational institutions

Starting the very first days of the campaign, we recorded numerous cases when employees of educational institutions were drawn into the campaign. Following up on our alerts, the Ministry of Education, Science, Culture and Sport issued a [statement](#) on September 6, 2023, in which it urged not to use educational institutions in political processes. Despite this call, the vicious practice persisted.

Employees of educational institutions, often gathering in groups, were often found in the campaign events of "Civil Contract" party. Examples include the following instances:

- On September 7, many employees of condominiums, schools and kindergartens, as well as students of cultural centers were [present](#) at the rally in Nor Nork. Organized transfer of rally participants by buses was noted.
- On September 9, employees of kindergartens and schools were [seen](#) participating in a campaign event in Avan-Arinj Park. It became clear from the conversations they had amongst themselves that they had come at the instruction of their directors. When our observers asked them to disclose which schools and kindergartens they worked for, they refused to answer.
- The coach of "Qanaqer-Zeytun Youth Sports School" CNCO was [involved](#) in organizing "Zeytun Day" on September 12 in Qanaqer-Zeytun administrative district. He actively encouraged the participation of school students in the campaign event of "Civil Contract" party. The coach of the sports school shared the [announcement](#) of a rally event in a parents' social media group and stated that "everyone's presence is desired and mandatory", and [reminded](#) the parents hours before the event that their children had to be present at the event. In general, the school's [FB page](#) posted numerous campaign posts promoting Tigran Avinyan and "Civil Contract".
- The same event's announcement was [shared](#) in the parents' group of "Music School after Anushavan Ter-Ghevondyan" CNCO with a strong emphasis that the [participation](#) of school students and their parents is very much desired and that this request was made also on behalf of the school director.

- Collective participation of representatives of educational institutions was noted at "Civil Contract's" September 15 march and rally. Teachers from Alaverdi town's school N 10, several kindergartens of Vanadzor, schools and kindergartens of Shengavit administrative district were among the participants of this campaign event.

Forced participation of employees of state and community organizations in campaign events

On the last campaign day, September 15, "Civil Contract" organized a massive march and rally of its supporters during which our observers noted numerous instances of misuse of administrative resources: For example:

- During working hours, the staff of Shengavit, Malatia-Sebastia, Avan, Qanaqer-Zeytun administrative districts were [bussed](#) in an organized manner to various campaign sites to participate in the march and rally.
- Artashat, Vedi, Talin, Gyumri, Paraqar local governance staff, as well as Shirak regional governance employees participated in the march and rally in an organized manner, predominantly leaving their workplaces on working hours.
- Employees of the Ministry of Justice, its Compulsory Enforcement Service, Ministry of Environment's "Office of Implementation of Environmental Projects" were instructed and urged to participate in the rally.
- Collective participation of employees from the Ministry of Foreign Affairs, Yerevan General Jurisdiction Court, Yerevan Municipality and other ministries was noted.
- Employees of educational institutions from Alaverdi and Vanadzor towns, Shengavit administrative district of Yerevan participated in the campaign events. It was reported that they were there against their own will.
- Observers noticed the employees of "Kotayk" beer factory at the march and rally. They were brought to these events against their will, as reported to our observers.
- Employees of Arabkir administrative district participated in the march and rally in vehicles owned by the district administration.
-

Campaign-running in parallel with carrying out local self-governance functions

Active promotion of "Civil Contract" party was carried out along with all the repair and reconstruction projects, ceremonies of acceptance of projects or openings of buildings or parks carried out during the campaign period in all of Yerevan's administrative districts with additional funds provided by the central government. During these events, accolades were frequently given to the heads of districts, often in their presence, who were at the same time running in the election campaign as part of "Civil Contract" party.

Residents of Qanaqer-Zeytun have for years been complaining from the dismal condition of water supply pipelines. Only on August 21, 2023, did Deputy Mayor Tigran Avinyan make a decision during the municipal management meeting to have the pipes replaced.

- Artak Hovakimyan, head of Qanaqer-Zeytun administrative district actively visited all those residential blocks where repair works were being carried out, for example, at Dro St. 6, Minas Avetisyan Park or at Dro St. 24 sports ground.

- Nor Nork administrative district's FB page stated that with the efforts of the District Head, Armen Mheryan, who ran number 37 in "Civil Contract's" campaign list, Nansen Park was equipped with a [lighting system](#). The residents, however, report that the park was always lighted, simply in the run-up to the campaign period the lighting grid was modernized, which was presented as the achievement of Mheryan.
- Repair works were launched in the backyards of apartment complexes in Nor Nork's 4th Microdistrict, where no repairs had been done for about 10 years. Head of Nor Nork district, Armen Mheryan and Deputy Mayor Tigran Avinyan participated in the opening of a playground in the 7th Microdistrict of Nor Nork.
- Renovation of Nor Nork 3rd Microdistrict Polyclinic was approved after more than 10 years of neglect. The road from Safaryan St. up to Gyurjyan St. was asphalted. The backyard of School N 160 was repaired.

Parallel to large-scale construction work and improvement of infrastructure, issues presented by individual residents or groups of residents were quickly addressed. For example, we found out during our interviews with the representatives of "Civil Contract's" campaign offices that residents report issues to the offices and office representatives contact the district administration and quickly resolve the issues (for example, Ajapnyak district administration installed windows in one of the buildings). Many issues reported by residents were resolved in this manner.

Despite the intensive visits and active [campaigning](#) in various administrative districts and residential blocks that started around 1 year before the elections, Tigran Avinyan avoided visiting such areas, where residents had been resisting illegal construction (for example, the Physics campus) and had issued a special [invitation](#) to Avinyan to see them.

Organization of cultural and entertainment events

The sharp increase in the number of various festivities, concerts organized during the political campaign period, often with community funds, is remarkable.

- Center administrative district's Department of Education, Culture and Sports handed out 1400 Zoo gift-tickets to pupils of schools. For School N 53 after Khanjyan, the visit to the Zoo was organized in Yerevan City Tour tourist buses.
- During a visit to check the reconstruction of the football field at Andranik St. 32, the Head of Center administrative district organized an entertainment event for children featuring cartoon characters, fun games, singing and dancing.
- Open-air opera [concerts](#) were organized from September 12 to 15 at Tumanyan Park. The first in this series of open-air concerts was organized in June as part of the jubilee events in tribute to composer Aram Khachaturyan, and were repeated just three months later during the campaign period.

Several administrative districts organized so-called "Administrative District Festivals", events that were not in the tradition or had not ever been carried out before. "Akanates" submitted an official request for information to Yerevan municipality inquiring about the legal grounds for designating these festival days. The response indicated that 6 out of the 12 administrative districts did not have festival days, 3 of them – Ajapnyak, Shengavit and Nubarashen had their festival days in June, another 3 – Nor Nork, Davtashen and Nork Marash – in September. The

festival days for the last two districts were determined in September 2023. These were going to be the ever first district festivals.

For the festival dedicated to Nor Nork administrative district that took place on September 9, unprecedented amounts of money were spent – around 8 times more than for similar events in general. During this event, a ceremonious presentation of the repairs and improvements was made.

Despite the fact that in its response Yerevan municipality mentioned that Qanaqer-Zeytun administrative district did not have a festival of its own and no funds were spent for it, such a festivity was in fact organized on September 12 and was attended by Tigran Avinyan himself and featured his campaign [speech](#).

Administrative District	Timeline of the festivity named after the district	Funds spent on the festivity in September 2023
Davtashen	September 2023, first time	694,000 AMD
Nor Nork	September 2023, first time	8,770,000 AMD
Nork-Marash	September 2023, not the first time	1,694,600 AMD
Qanaqer-Zeytun	September 2023, first time	n/a

Other instances of misuse of administrative resources

In the run-up to the elections, on September 3, 2023, "Civil Contract" front-runner Tigran Avinyan made the following [statement](#): "There are many residents of Yerevan with bad debt – around 150, 000 people – and they have turned to me with their issue. We have had discussions with the Minister of Labor and Social Issues and want to develop a program in the logic of debt cancellation to help these people load that burden off, as they face financial problems."

On the last day of the election campaign, Yerevan municipality published a paid ad on "Theatric Yerevan 2024" program, an open call for grant applications to win 2,5 mln AMD (total fund 10 mln AMD). It is noteworthy that a grant [competition](#) under the same title of "Theatric Yerevan" was already held in the summer of 2023.

5. Other Problematic Irregularities

Recruitment of minors in the rallies

Children not enjoy suffrage, there are no excuses for their recruitment in campaigns. Any kind of participation in political campaigns must be based solely on their wish to do engage in volunteerism.

We have recorded a number of instances when political forces recruited groups of minors in their campaign activities to create an impression of mass participation and with that, perhaps to win the support of voters. The children were often wearing T-shirts with party/alliance logos, held party flags and distributed fliers. We did not notice their parents close by.

- At least 19 minors participated in the residential block meetings of "Country to Live" party in Qanaqer-Zeytun administrative district, in the rally organized in Buenos Aires Park, Davtashen and Center administrative districts.
- 11 minors were noticed participating in "Mother Armenia" alliance's march and campaign meetings in Nor Nork.
- At least 17 minors participated in the residential block meetings, marches of "Civil Contract" party organized by Arabkir district's head, with the minors holding party flags.
- During one of its street meetings, "Fair Armenia" engaged at least 4 minors.

The other instances of misuse of administrative resources by engaging children in the campaign, as has been described above, come to support that the principle of voluntary participation was clearly violated.

Instances of offering material benefits for participating in rallies

Instances of attracting rally participants by offering material benefits, a criminal offence under Armenia's Criminal Code, Article 236, Part 2, have been observed.

"[Promo host](#)", an advertising company, announced in its company Instagram chat that it was recruiting young women for 1000 AMD per hour to participate in campaign rallies "to simply walk," with no mentioning of which political party the recruitment was intended for. Those interested, were asked to send a photo of themselves to be approved. Those approved were instructed to wear white shirts and jeans, an outfit matching "Civil Contract" party's [campaign outfit](#). The recruited rally participants were invited to "Civil Contract's" headquarters at Sayat-Nova 40 where the campaign marches and rallies of "Civil Contract" were to kick off. A similar announcement was posted on the timeline of "City Promotion" user account on FB, which said that "large numbers of girls and boys are needed for an outdoor event to hold flags" during which they would be asked to distribute fliers. "Akanates" reported these instances to law enforcement bodies.

In addition, "Akanates" observers were personally told by an underage participant of "Civil Contract's" rally on August 30 in Buenos Aires Park of Ajapnyak district that they were paid 4000 AMD for holding the party campaign flag.

Charity or pledges of charitable assistance

Armenian law incriminates provision or pledge by a party or any entity acting on behalf of the party of money, food, securities, goods or products to voters free of charge or under preferential conditions in the disguise of charity or in any other form during the period starting the date elections are announced until the results of elections are announced. This is a punishable offence under Article 221 of the Criminal Code.

During its election campaign, "Country to Live" party handed out, along with promotional materials, [gift-cards](#) to selected voters. These are hard plastic cards with the party name and logo on one side and the following statement on the other: "Keep this card. Surprises after September 17". Some elderly voters who received these cards thought that they were given bank account cards as a gift.

Such gift-cards created an apparent expectation that recipients were going to receive a certain good (product, service). To a verifying question posed by "Akanates" observer who contacted "Country to Live", its representative confirmed that voters would get gifts if they kept the cards, however the details would be known only after the elections. "Akanates" reported this case to the prosecutor's office.

Hate speech and abusive discourse

Hate speech is a targeted way of speaking which rejects the fundamental human rights of dignity and equality and attempts to demean individuals and groups of people and their position in the society. Hate speech risks to incite physical or psychological violence, including on grounds of political views.

During the election campaign, our Observation Mission noted several manifestations of public speech with elements of hate speech. During a meeting on August 29 in Ajapnyak district, Mary Markosyan of "Homeland Power" party spoke privately to one of our observers saying "the city must be cleared of the Indians and Persians", also called for burning LGBT persons.

The language spoken by Vardan Ghukasyan of "Public Voice" party during his addresses streamed online, contains elements of hate speech, hostility and swearwords towards other candidates.

Besides hate speech, prevalent during the entire election campaign were abusive language, personal targeting and hostility. Most notorious was "Mother Armenia" alliance, which intended to insult the government and city authorities with phrases such as "young Turks", "South-Caucasian Tatars", "Nikol the Traitor", "junk pile at the head of the government." In a street meeting with the residents, Andranik Tevanyan, front-runner of the alliance, made the following statement: "We are going to publicly execute that traitor by shooting, we will execute him". They shouted these phrases out inviting children, unaccompanied by parents, to join them.

Obstruction of the campaign and violence

Our observers noticed many instances of promotional materials scratched from the free sites designated for election promotion and even from non-designated sites. This is obstruction of the political campaign. We took record of 24 such instances in relation to "Civil Contract" party materials, 10 cases for "Country to Live" and "Homeland Power" each, and 2 cases for "Bright Armenia", "United Armenia", "National Progress" parties each.

On August 24, residents at Shinararner Street did not allow the representatives of "Mother Armenia" alliance to present their election program and to speak with them, they called the alliance representatives names and demanded to leave the area.

On September 3, supporters of "National Democratic Pole" party gathered at the campaign office of "Civil Contract" in Araratian microdistrict, splashed the office with water, called "Civil Contract" representatives names. The latter forced the aggressive people leave the office area.

On September 8, during the residential district meetings of "Civil Contract", a resident clashed with the party supporters. The resident, who was coming out of the building, saw them and shouted "Nikol the Traitor", two of "Civil Contract" supporters approached and started hitting the resident. Seeing that our observer and a police officer were approaching, fellow supporters removed the abusers from the scene and urged the rest to quickly move on. The police did not attempt to bring the assailants to responsibility.

Obstruction of observation

The rights of observers are laid out and protected by law, specifically by Articles 30-32 of the Electoral Code, with Article 210 of the Criminal Code, setting responsibility for obstructing exercise of these rights.

On September 6, the observer of "Akanates" mission was on a monitoring visit at Rustaveli 17 address (in the Center of Yerevan) to check the accuracy of voter lists. "Civil Contract's" campaign office was located on the same street. Our observer took photos of the office and the promotional materials around the area. Acting director of Kindergarten N 11, Sofik Karapetyan, approached our observer and said that it was not allowed to take photos of the office and to ask questions about it. The woman started a quarrel with our observer, obstructed taking photos, snatched the observer certificate issued by CEC and refused to return it. Two other women joined her (assumably from the campaign office) and continued arguing around observer rights. "Akanates" reported to the police about this incidence.

In another incidence, our observer took photos of the organized participation of employees of Artashat community administration and Ararat regional administration in the final rally of "Civil Contract" party, after which a few of the participants of the gathering approached and threatened our observer demanding to delete the photos.

During a show called "[Interview](#)" (minutes 15:35-21:06) by "24 News" channel, "Civil Contract" front-runner Tigran Avinyan made statements about "Akanates" Observation Mission in which he accused the Mission in "manipulations", in disseminating information that "did not match with the reality." He mentioned that there were "serious and deep issues" in relation to the impartiality of "Akanates" and that he "doubted" the philosophy of the mission, its impartiality. He also cast doubts about the funding sources of election observation organizations. During a live broadcast, he also urged not to mention the name of "Akanates" in his presence. Tigran Avinyan made other defamatory and offensive statements in relation to "Akanates" Observation Mission during a [conversation](#) with journalists on September 6 (starting minute 42:30) and during an [interview](#) to CivilNet (minutes 07:30 - 14:55).

Gnel Sargsyan, listed N 83 in "Civil Contract's" party list for the municipal elections made aggressive and abusive [posts](#) on his own Facebook account, as well as in the [comments](#) section of "Akanates" Observation Mission in reaction to some of our revelations.

6. Transparency of and Oversight over Campaign Financing

Declarations on properties and income owned by parties, declarations on deposits made onto campaign foundations of parties/alliances and incurred costs, as well as annual financial reports of parties are crucial for the accountability of political forces.

Financial oversight over parties can only be done through comparing and analyzing these documents, however the lack of a standardized approach in declaring data, provision of incomplete and incohesive data impede oversight over parties and particularly the lawfulness of election campaigning.

Declarations of party properties and income

As stipulated in Article 8 of the Electoral Code, parties (alliances) running for elections, have to submit a declaration on property and income owned by the party (each party included in an alliance) to CEC within 5 days after registering for elections. The declarations are disclosed by CEC on its website in a scanned format. There is no state oversight over the accuracy and quality of provided information. The law is not clear either on what is required in this regard.

Research shows that the [declarations](#) submitted to CEC on properties and income are not filled in a unified manner. For example, some parties fill in data of identifying their donors, others only give a general category of "donors" and total sums of donated money. Some parties do not declare their property.

The declarations are not sufficiently accessible for the purposes of monitoring. They cannot be machine-read and do not allow for processing, reuse and reproduction.

Declarations on deposits made onto campaign foundations and campaign costs

According to Article 139 of the Electoral Code of Armenia, parties and alliances running for elections should make campaign-related expenditures from the funds available on their campaign foundation accounts, declaring all donations and expenditures to the Oversight and Audit Service of CEC. For Yerevan municipal elections, these declarations are submitted for three periods – on the 10th and 20th day after the election campaign kicks off, within 3 days after election results are finalized.

Any natural entity is allowed to make a donation to the campaign fund of the party/alliance in a sum up to 100-fold of the minimum wage (this amounts to 100,000 AMD). The AOS of the CEC reviews the declarations, makes a conclusion on the findings of its review and submits the conclusion to the CEC, which immediately publishes the declarations and respective conclusions on its website.

Declarations submitted on deposits made onto campaign foundation accounts and expenditures made from these funds are not presented in a standardized manner either.

Certain parties declare the addresses of their campaign offices and how much money was spent on each of them, while others present the campaign office costs without specifying addresses. Some of the campaign offices that our long-term observers visited, including all of the 21 campaign offices of "Civil Contract," were not reflected in the declarations at all. In certain cases, the headquarter offices of parties were included in the lists of campaign offices and in others – not, while it is probable that all of the party offices in Yerevan were used as campaign offices.

Examination of the declarations of "Mother Armenia" alliance shows that the same natural entity made 6 donations to the alliance foundation on August 30, each in an amount of 100,000 AMD, however the [conclusion](#) published by CEC AOS on September 8 stated that "no irregularities were found in the declarations." In response to "Akanates" mission's information request, CEC mentioned that the 500,000 AMD that exceeded the maximum permissible amount of donations was transferred to the state budget of Armenia. Their conclusion, however, did not reflected this.

Examination of the declarations of the other parties running for municipal elections showed donations made by legal entities, which is forbidden by law. "Country to Live" party's declaration showed a donation in the amount of 360,000 AMD made to the campaign foundation by "Green Way" CJSC. Another legal entity, "City Signs" donated 382,000 AMD to the "Republic" party. "Civil Contract" party received 19,247,240 AMD; 3,200 AMD and 127,000 AMD from "Koriz-M" CJSC, "A-TV" and "Shark" CJSC respectively. The records on the declarations of "Country to Live" and "Republic" parties do mention that the donations received in violation of the law were transferred to the state budget. In its last [conclusion](#) of September 23 over declarations, the Oversight and Audit Service made generalizations that maximum permissible amounts of donations were exceeded, cases of anonymous donations and ones made by persons who did not have voting rights were recorded, the donations were transferred to the state budget. The conclusion, however, does not clarify which specific donations were in violation of law and for which parties were they made. The sum of the illegal donations mentioned by the AOS does not match the figures available on the declarations.

Just like the property and income declarations, the declarations on donations and their expenditure are not processable for analysis. The format of the data presented is not open and machine-readable, therefore the data cannot be processed, reused and reproduced.

It is worrisome that the Oversight and Audit Service of CEC does not properly document cases when the submitted declarations are incomplete and inaccurate. The Service does not provide details on the issues it identifies. The effectiveness of its oversight functions is not palpable.

Annual party reports

In accordance with the constitutional Law on Parties, each party is obliged to publish an annual report, and in certain cases, also an audit statement, at www.azdarar.am official public announcements website not later than May 31 of the year following the reporting year.

Our Mission identified that certain parties had not submitted annual reports, some submitted with significant delays, and did not comply with the requirement of attaching an audit statement

in required cases. The reports available publicly are not always machine-readable as open data.

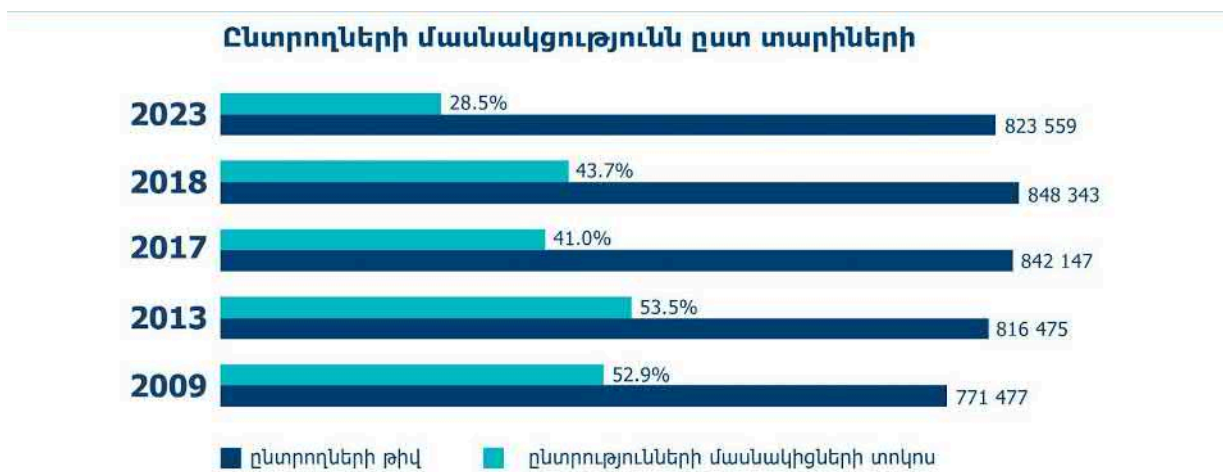
We have also identified mismatches between the data presented in the annual reports and the property and income declarations submitted after registration for running in the elections. The data presented in annual reports are not complete, which makes it difficult to scrutinize them and creates a skewed picture of the actual property owned by parties.

Election Day

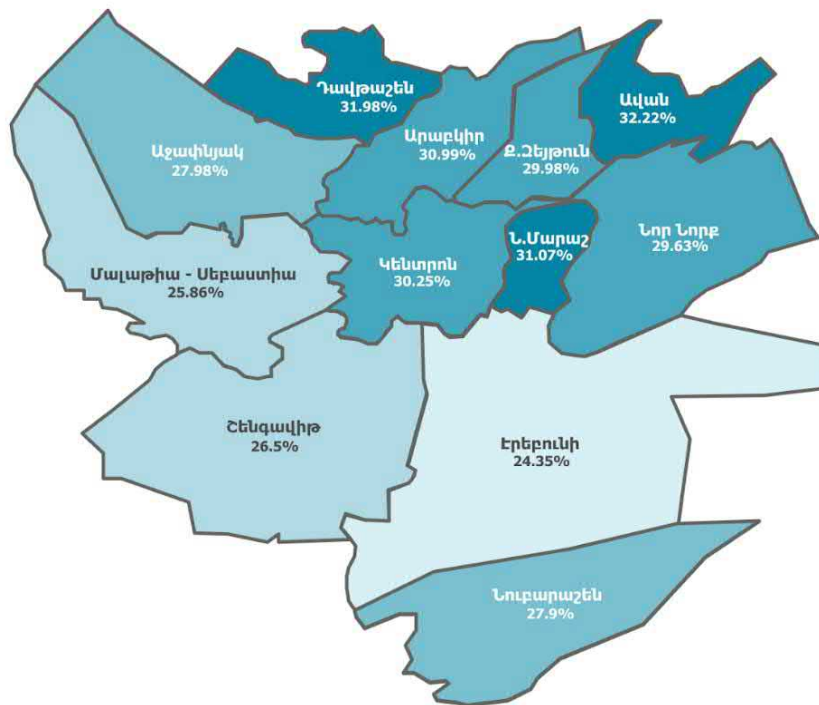
"Akanates" Observation Mission conducted observation of the election day of 2023 September 17 municipal elections of Yerevan.

Turnout

The turnout for the municipal elections on September 17, was 28.46% of all voters, the lowest turnout rate in the history of Yerevan municipal elections.

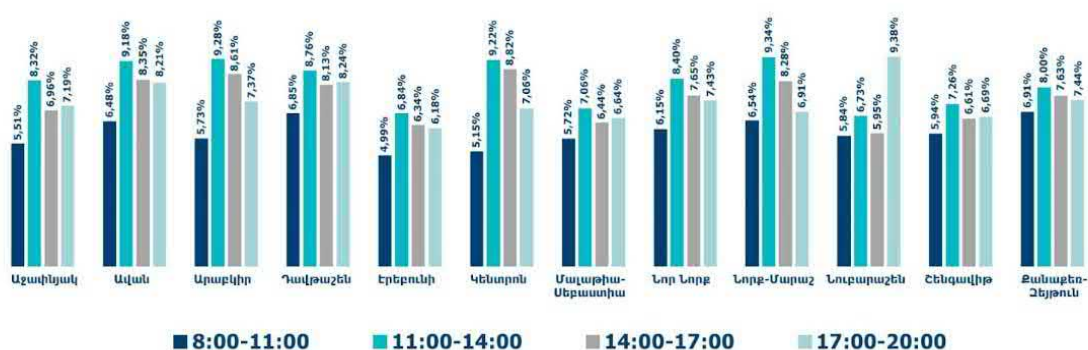


The turnout dynamics did not show any significant outliers and was proportionally distributed by hours of the day.



Highest turnout rates were documented in Avan (32.22%), Davtashen (31.98%) and Nork-Marash (31.07%) administrative districts, while the lowest rate was in Erebuni administrative district (24.35%).

Ընտրողների մասնակցությունն ըստ ժամերի



Our observations of the preparation of the elections, the voting process itself and the finalization of election results in polling stations covered by our Mission did not identify any serious irregularities. All the legal procedures were duly maintained. In general, Election Day was peaceful.

Significant irregularities that we recorded involved the representatives of various political forces, however these were sporadic and uncoordinated. Issues related to voting secrecy were mainly caused by designating an improper venue for the polling station or improperly setting up the voting rooms. Technical and procedural issues can be mainly attributed to lack of necessary knowledge and sense of responsibility and discipline among PEC members. Cases when observer statements on irregularities were not registered in the election record books, demonstrate the attitude of certain PEC chairpersons and secretaries toward the requirement of the law.

Preparation phase

In scores of polling stations, we noted accessibility issues for persons with disabilities even though they were marked "accessible" or "partly accessible" by CEC on its website. Later, we found out that CEC had made these markings for polling stations often without verification.

We took note that the zero reports generated by the electronic voter devices were printed late and in two instances they were not stored correctly.

- Based on information collected from many polling stations, we found out that the electronic devices print out the zero reports not earlier than 08:00 of election day. This runs contrary to the logic of the law, which states that by 08:00 all the preparatory procedures should have been completed and the polling stations should open at 08:00 to accept voters.
- In polling station N 9/47, the zero report (tape) printed by the electronic voter device was attached to the election record book only at 12:50, upon the remark made by the observer. The zero report was kept in the safe before this moment. A respective record was made in the election record book.
- In polling station N 2/48, the the zero report (tape) printed by the electronic voter device was not attached to the election record book before 11:30. The error was corrected only after the remarks of the observers. Before that, Gayane Alekyan kept the zero report inside some brochure, most probably in an elections guidebook. A respective record was made in the election record book.

We noted that the safe was unlocked and the ballot boxes were not properly sealed in the following polling stations:

- In polling stations N 6/3 and 10 /43, the safe was unlocked before 07:00, the time the precinct electoral committee was supposed to convene its session. The safe was unlocked in the presence of police officers who were not supposed to be inside the polling station.
- In polling station N 8/27, the order in which the ballot-box was to be closed and sealed was not maintained.
- In polling station N 8/38, the ballot-box was not sealed. The issue was resolved upon our observer's written remark made in the election record book.

In two of the polling stations, our observers noted presence of outsiders.

- In polling station N 2/40, an outsider was noted speaking with PEC chairperson Armine Kocharyan. The two later entered the polling room and continued speaking about technical equipment. To the question of our observer, PEC chairperson responded that this was the bodyguard of the prosecutor who was inquiring about the procedure of voting.
- In polling station N 4/34, the head of one of campaign offices of the competing parties approached a member of the precinct electoral commission and engaged in a conversation. Upon the suggestion of the observer, this person was removed from the polling station after about 1 minute.

Ballot-casting

In two polling stations, we took note of three issues related to voting rights.

- The personal data of two persons registered in the voter lists of polling station N 6/06 were not available in the electronic voter device, as prompted by the device signal. One of them eventually managed to vote after the device recognized their ID card. The other person was forbidden to vote and was suggested to return with another document verifying their identity, even though the person had a valid identification document. This irregularity was recorded in the election record book.
- The personal data of a person registered in the voter lists of polling station N 10/02 were not available in the electronic voter device due to which the person was forbidden to vote even though they had a valid identification document. DEC referred them to obtain an additional reference document. The irregularity was recorded in the election record book.

Three issues were noted in relation to providing ballots and the ballot box.

- The PEC member of polling station N 5/2 did not include ballot N 12 of the respective political party while distributing the ballots. After a remark by the PEC chairperson, the issue was resolved.
- In polling station N 7/60, ballots N 4 and 14 were visibly few in the stack. Upon the remark made by the observer, Artur Baghdasaryan, PEC chairperson added them to the stack.
- The PEC member in charge of the ballot box in polling station N 7/13 did not properly close the slit of the ballot box after each time a ballot was cast. This irregularity was recorded in the election record book and discontinued.

In three polling stations, our observers noted issues related to set-up and voting secrecy, which were often a result of improper venue selection for the polling station, or polling room.

- The set-up of the voting room of polling station N 1/01 did not ensure the secrecy of voting. There was a door next the voting booths which was frequently used by PEC members. The suggestion of our observers to change the set-up was rejected.
- At 17:40, our observer took note of an irregularity in polling station N 8/23 during which PEC member Svetlana Gharakhanyan from "Mother Armenia" alliance violated voting secrecy. In charge of stamping, this PEC member was seated so close to the voting booths that she was able to see the voting itself. She would make remarks for the voters not to fold the ballots, not to tear or damage them. Chairperson Astghik Aghekyan stopped this from happening by removing the stamps table from the voting booths. The remarks of the observer were recorded in the election record book.
- In polling station N 10/12, there was a door by the voting booths, which was not locked, and no key was available to lock it. The door could have been used the commission members. The polling station was located in a public school.

One instance was taken note of in relation to the procedure of aiding the voter.

- In polling station N 1/14, the voter entered the polling station with an aiding person who was not a voter of the same polling station. The observer informed about this to Anna Tigranyan, chairperson of the PEC and requested to make a record in the election record book, however this request was rejected.

Our observers noted the presence of persons unrelated to official voting procedures in certain polling stations and in certain cases, took note of what seemed to be control or attempts to control over voter participation in 13 instances.

- Within a radius of 50 meters outside polling station N 2/04, a particular person remained standing for about an hour and a half, often accompanied by a few others. This person would regularly greet persons heading to the polling station and would talk to them. The person was registered at the polling station as a proxy for "Civil Contract" party. When urged to leave, the person would oppose and say that it was their residential block and backyard. The person eventually left the scene after the intervention of PEC chairperson Hakob Papoyan.
- A person unrelated to official election procedures visited polling station N 2/30 twice, once with a man, another time with a group of women. Our observer took a photo of the scene after which the person left the polling station.
- In front of polling stations 6/18 and 6/19, three persons would look up a list in their hands and make phone calls checking whether the persons taking the calls had already come to the polling station and/or where they were. After the incident was recorded and photographed by our observer, these persons left the site. They, however, were later seen at another polling station, polling station N 6/32, where they had a brief meeting with Lusine Jamalyan, proxy for "Mother Armenia" alliance and again left the polling station after they saw that our observer took record of their actions. After a while, two of the same persons were noticed in front of polling station N 6/44 talking to others. A report of crime was filed with the Prosecutor's office.

- In polling station N 7/44, at 19:10, our observer noted that Alieta Zaqaryan, proxy of "Civil Contract" party, gave her phone over to PEC chairperson Hasmik Sargsyan who spoke into it and said that she would not be able to provide data, that data would only be transferred to CEC and returned the phone to the proxy. When our observer made a note in the election record book, chairperson Sargsyan said that she was urged "to give blank forms for making notes on the final results of elections." She refused to do that. Afterwards, she contacted CEC and received confirmation that what she did was correct. The observer's notes were recorded in the election record book.
- In polling station N 8/40, located in School N 75, the School Principal lingered around for about 30 minutes offering help in organizing election work. Upon the intervention of chairperson Taguhi Teqiryan, the Principal left the site.
- In polling station N 9/22, "Democratic Mobilization" party's candidate Marine Malkhasyan remained in the polling station for 40 minutes and attempted to intervene in the work of the PEC. After observers engaged PEC chairperson, the latter invited Malkhasyan out. Malkhasyan, however, did not leave immediately and behaved aggressively towards both the observers and the chairperson of the precinct electoral commission. Malkhasyan eventually left at the intervention of police officers. The incident was recorded in the election record book.
- In polling station N 9/56, Razmik Kocharyan, proxy for "Civil Contract" party, registered in the election record book as a proxy present in the polling station, was actually absent for about 2 hours. He was first in an area adjacent to the polling room, then outside the polling station, in the backyard, speaking to a group of people. After the remarks made by our observer, he returned to the voting room. Our observer informed Ashot Adunts, PEC chairperson that an irregularity took place in relation to the records made in the election record book and that the observer wanted to make a record in the election record book, however was rejected to do so.
- In polling station N 9/57, a person unrelated to the official election procedures was present for a prolonged time. Armen Yeghiazaryan, a candidate from "Homeland Power" party remained in the polling station for about 30 minutes and left only when urged by PEC chairperson and upon the intervention of police officers. The incident was recorded in the election record book.
- In polling station N 10/15, our observers noticed that "Civil Contract's" proxy person was intensively making phone calls, writing texts in the phone, speaking with voters. To the remarks of our observer, this person clarified that people were greeting and approaching them, because they are known by public.

During our observation of the videos streamed by CEC, we noted a violent incidence in one of the polling stations.

- In polling station N 9/2, some voters shoved and pushed each other, which lasted for only a few minutes. The situation was eased by a party proxy person.

Finalization of election results

During finalization of election results, three procedural irregularities were seen.

- In polling station N 2/19, at 20:00, when the polling station closed, two candidates who had earlier entered there, were not wearing their badges (certificates) and were only

holding them in their hands. The issue was resolved after our observer voiced about it.

- In polling station N 7/42, at around 22:00, two proxies from "Civil Contract" remained inside, one of whom was not registered as a proxy. The unregistered proxy left the polling station only after our observer voiced about the issue.
- In polling station N 10/43, a wrinkled ballot that was otherwise proper, was found invalid. This was recorded in the election record book.

Tabulation of results

"Akanates" Observation Mission observed the work of 10 DEC's starting 20:00. The tabulation of results went mainly smoothly. The more notable irregularities were the following:

The ballot bags submitted by a number of polling stations were open, or a need had arisen to unseal them or other issues were recorded in relation to bags.

- In polling stations N 7/03, 7/04 and 7/47, the ballot bags were all open. A record was made on this and all the bags were sealed.
- The ballot bags submitted by PECs N 2/47, 2/48, 2/27, 2/17, 2/51, 2/16, 2/24 and 4/31 had to be unsealed because the local commissions had erroneously placed the packages of voter lists in them. These lists were supposed to be submitted together with the bags, but not inside.
- The ballot bags submitted by PECs N 3/31, 5/08, 5/15, 5/3, 5/19, 5/13, 6/41, 9/9, 9/25, 9/26, 9/43, 9/59 had to be unsealed, as they contained items that should not have been placed in them.
- The bag submitted by polling station N 4/23 had to be unsealed as it contained items (voter lists) that should have been placed in small packages, while the small packages contained items that should have been in the bags.
- Instances when items/documents not belonging to the bags were placed in them and conversely, documents that were found in small packages but should have been placed in ballot bags were noted in relation to polling stations N 5/4, 8/5, 9/9, 9/25, 9/26, 9/43, 9/59.

There are mismatches in the protocols of a number of polling stations.

- In polling station N 1/03, the number of receipts generated by the electronic voter device and the number of voters (517) exceeded the sum of ballots cast for all the candidates and the rejected ballots (515). The DEC concluded that the difference could be attributed to voters receiving a receipt but not casting a ballot. After consulting with CEC, the chairperson and secretary of the PEC were instructed to change the original figures specified in 2 of PEC protocols to 515. These changes were not recorded in the election record book. The observation of our observer was recorded in the election record book.
- In 2 protocols made by polling station N 1/11, the number of voters and device-generated receipts was 603, however the sum of ballots cast for all the parties and rejected ballots was 606. The PEC chairperson and secretary, after consulting with each other, stated that the number of ballots in favor of "Public Voice" party had been erroneously counted 73 instead of 79. Here too, they received instructions from the

DEC to change the original data of the protocols by changing both the number of ballots cast for "Public Voice" party (73) and by changing the number of total voters and device-generated receipts (600).

- In the protocols presented by polling stations N 5/17, 5/14, 5/07, mismatches were noted in the number of voter receipts and unused sticker stamps and the sticker stamps sent to the DEC. Making records on the mismatches, the PEC members made adjustments to the protocols on voting results.
- PEC N 3/5 submitted an incomplete protocol to the DEC, which was completed in the DEC.
- Members of PEC N 9/24 submitted protocols without their signatures. At 05:00 they were summoned to DEC in order to sign the protocols.

The work of precinct electoral commissions

One instance of obstructing observers' access to the polling station occurred.

- In polling station N 8/35, the simultaneous presence of two "Akanates" observers was obstructed to some degree, because PEC chairperson Arayik Galstyan and secretary Karine Shakhbazyan did not have a clear stance on the lawfulness of the presence of two observers from the same observation mission. It took 20 minutes to resolve the issue, after having contacted DEC several times (including by "Akanates" coordinating center).

We noticed many technical flaws in the work of DEC's. These instances demonstrated the degree to which DEC members were knowledgeable about the requirements of the Electoral Code and how thoroughly they organized the voting process. For example:

- In polling station N 2/37, at 19:10, it was noted that PEC chairperson Anna Harutyunyan and secretary Inga Hovhannisyan had prematurely signed the protocol files designed for voting result finalization hearing. The observation of the observer was recorded in the election record book.
- In polling station N 5/2, the election record book was filled in by PEC chairperson Mikayel Kirakosyan and secretary Nelli Tangamanyan by pencil. After the remarks of the observer, the issue was resolved.
- In polling station N 6/15, the order of rotating functions of committee members as was defined by a draw, was not maintained. In response to the remarks of the observer, PEC members said that the sequence of rotations was changed because one of the members had a visual impairment. The observer's observation was recorded in the election record book.

On Election Day, our observers noticed a few cases when treats were organized for PEC members. Such offers can potentially pose risks for the autonomy of PEC members.

- Armen Mheryan, Head of Nor Nork administrative district, also listed 37 on "Civil Contract's" candidate list, organized a food treat for the members of PEC N 2.
- Kamsar Babinyan, Head of Ajapnyak administrative district, also listed 23 on "Civil Contract's" candidate list, organized a food treat for the members of PEC N 6.

7. Complaints and Reports about Crime to State Bodies

"Akanates" Observation Mission lodged three complaints with the electoral commissions and four reports about crime with law enforcement bodies in relation to the irregularities it had made record of.

Complaints to DEC

On September 19, our Observation Mission filed two complaints with DEC N 6 and 10.

Administrative proceedings over these complaints were rejected on the grounds that the irregularities identified in them had already been recorded in PEC election record books and had been discussed by DEC.

Complaints to CEC

On September 20, one complaint was filed with the CEC in relation to the irregularities noted by our Observation Mission, namely in relation to the flaws found in the protocols of election results, mismatches of data, submission of incomplete, unsigned protocols, incorrectly stored voter lists, incorrect storage of election-related items in ballot bags, submission of unsealed ballot bags.

CEC rejected administrative proceedings over the complaint on the grounds that an NGO does not have legal standing to submit a complaint/request. As a result, CEC left the presented irregularities undiscussed, unevaluated and without due legal remedies.

The reasoning provided by CEC and the legal practice formed as a result of it is not lawful and contradicts Armenia's international obligations, as well as international standards set for democratic elections. To be more specific, Armenia's Electoral Code, Article 48, Part 3 stipulates that everyone may appeal the decisions and actions (inactions) of an electoral commission if they believe that their subjective rights to elect, as enshrined in the electoral legislation, were violated or may be violated. Each citizen's right to challenge violations of their objective rights to elect should be included within the framework of this right, as any person enjoying the right to elect should also be granted an effective legal remedy. The irregularities that took place during elections may impact each vote's final outcome and therefore each voter's full exercise of the right to elect. Any person who is an entity engaged in electoral legal relations, including voters, observers and observer organization's that submit complaints challenging the decisions and actions of electoral commissions in relation to violations of the objective rights to elect, should be subject to material scrutiny, examination and assessment. The opposite interpretation leads to the violation of the substance of the right to elect.

This issue has also be raised in numerous recommendations issued by international organizations and bodies to the government of Armenia.

Observations by international organizations

The Office for Democratic Institutions and Human Rights (ODIHR) of the Organization for Security and Cooperation (OSCE), in its [final report](#) on the presidential elections of February 18, 2013 in Armenia, made a recommendation that Armenia's Electoral Code be amended enabling citizens, local observers and civil society groups to solicit actions against the decisions and actions of electoral commissions, illegal campaign practices, as well as to challenge election results.

The European Commission for Democracy through Law (Council of Europe's Venice Commission), in a [joint opinion](#) issued together with OSCE/ODIHR on June 13, 2016, emphasized the earlier recommendations of OSCE/ODIHR to amend the Electoral Code empowering citizens, registered observers and civic society groups with the right to challenge the decisions and actions of electoral commissions, the unlawful actions noted during election campaigns and the final results of elections. The recommendation also included facilitation of the procedures related to submission and appeals of solicitations related to elections and extension of deadlines set to present irregularities occurred during elections and to appeal final election results.

In a [joint opinion](#) issued by Venice Commission and OSCE/ODIHR (CDL-AD(2016)031) on October 17, 2016, it was highlighted that a number of recommendations made in their earlier opinion of June 13, 2016, were still pending. They particularly stressed the recommendation on expanding the scope of entities enjoying legal standing for appeals.

The same issue was highlighted in the [final report](#) issued by OSCE/ODIHR in relation to the snap parliamentary elections of Armenia on December 9, 2018.

In its last and [final opinion](#) on the amendments of Armenia's Electoral Code (CDL-AD(2023)030 ODIHR-481/2023, para 64), the Venice Commission reinstated its recommendation to set out a right in the Electoral Code for voters, observers and observation organizations to directly challenge the voting/election results.

In accordance with Article 48, Part 7 of the Electoral Code, the DEC and CEC accept and respond to applications starting the election day, until 2 days before the finalization of results at 18:00, while decisions upon them, if they are made in accordance with the Electoral Code, are adopted before the finalization of election results, and for the elections of the National Assembly, one day before the date set for finalizing the election results. This provision excludes the possibility by CEC to examine complaints/solicitations against DEC decisions before the finalization of election results, because CEC is obliged to examine only those complaints that were submitted 2 days before the finalization of results at 18:00 end of the day. In contrast, the DEC has the power to make such a decision after this deadline too.

In legal practice, however, the overwhelming majority of DEC made decisions on the last day of the deadline to turn to CEC or on the following day. These deadlines, in essence, make appealing DEC decisions to CEC void, because by that time the deadline by which CEC is legally bound to examine applications has expired. Consequently, this legal regulation and the practice that has formed around it, indicate a lack of legal remedy for disputing the actions/decisions of electoral commissions.

Reports to law enforcement bodies

"Akanates" Observation Mission filed four reports with the Prosecutor's Office with a request to investigate irregularities of apparently criminal nature.

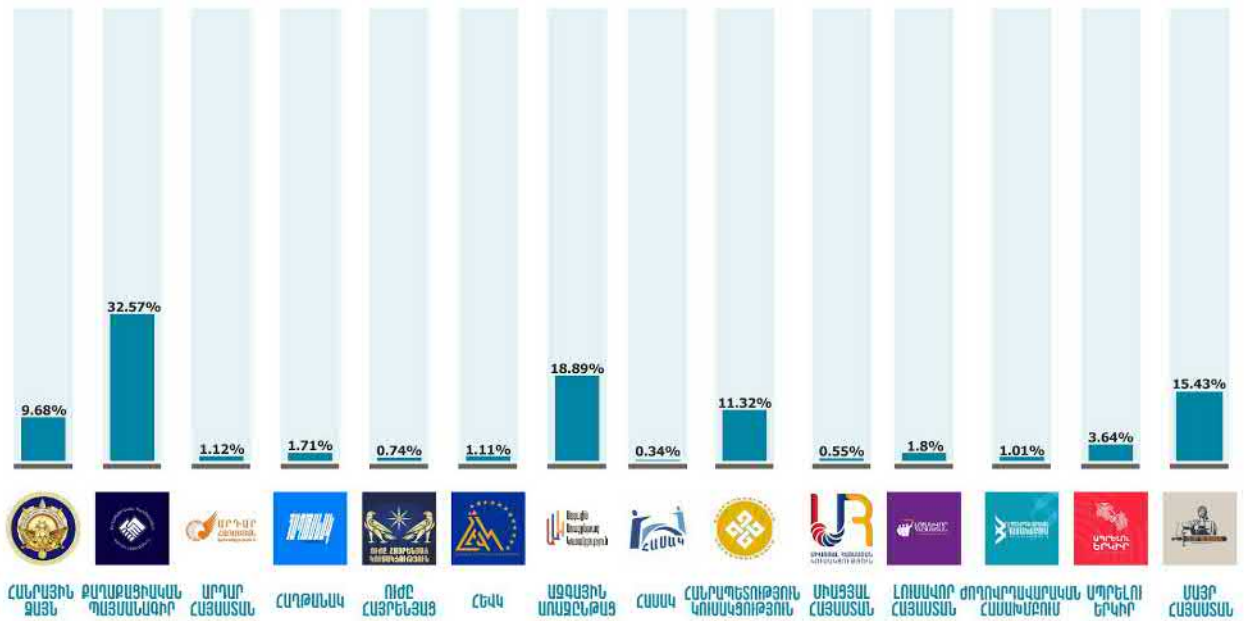
1. On September 4, 2023, a report was filed on accounts that people are offered material benefits for participating in a rally (Article 236 of the Criminal Code).
2. On September 8, 2023, obstruction by party campaign office representatives of the right of election observers to carry out unforbidden actions, such as photographing, was reported (Article 210 of the Criminal Code).
3. On September 6, 2023, a report was filed in relation to distribution of gift-cards by "Country to Live" party (Articles 221/219 of the Criminal Code).
4. On September 19, 2023, a report was filed in relation to violation of the free exercise of the right to elect with details on instances of controlling this right (guiding/controlling the votes cast) in several polling stations covered by DEC's N 6 and 10 (Article 210 of the Criminal Code).

The Prosecutor's office initiated criminal proceedings over the first three reports to investigate what apparently seemed like offences of criminal nature and their circumstances. The last report was left unattended on grounds that no offences were seen in the report.

To "Akanates" Mission's request for information, the Prosecutor General's office disclosed that as of September 15, 2023, law enforcement bodies had initiated a total of 17 investigations over electoral irregularities, of which 6 were related to threatening or offering material benefits to force participation in a legal or illegal assembly, 3 were related to violating the ban of engaging in charity work during the election period, 1 was related to compiling voter lists, providing them to citizens or parties or violating the procedure under which they could be disclosed, 4 cases were related to forcing engagement or refusal to engage in election campaigns or otherwise obstructing election campaigning, 1 case related to obstruction of the exercise of the voting right, the rights of persons participating in the work of electoral commissions or those otherwise engaged in electoral processes or carrying out duties in relation to elections.

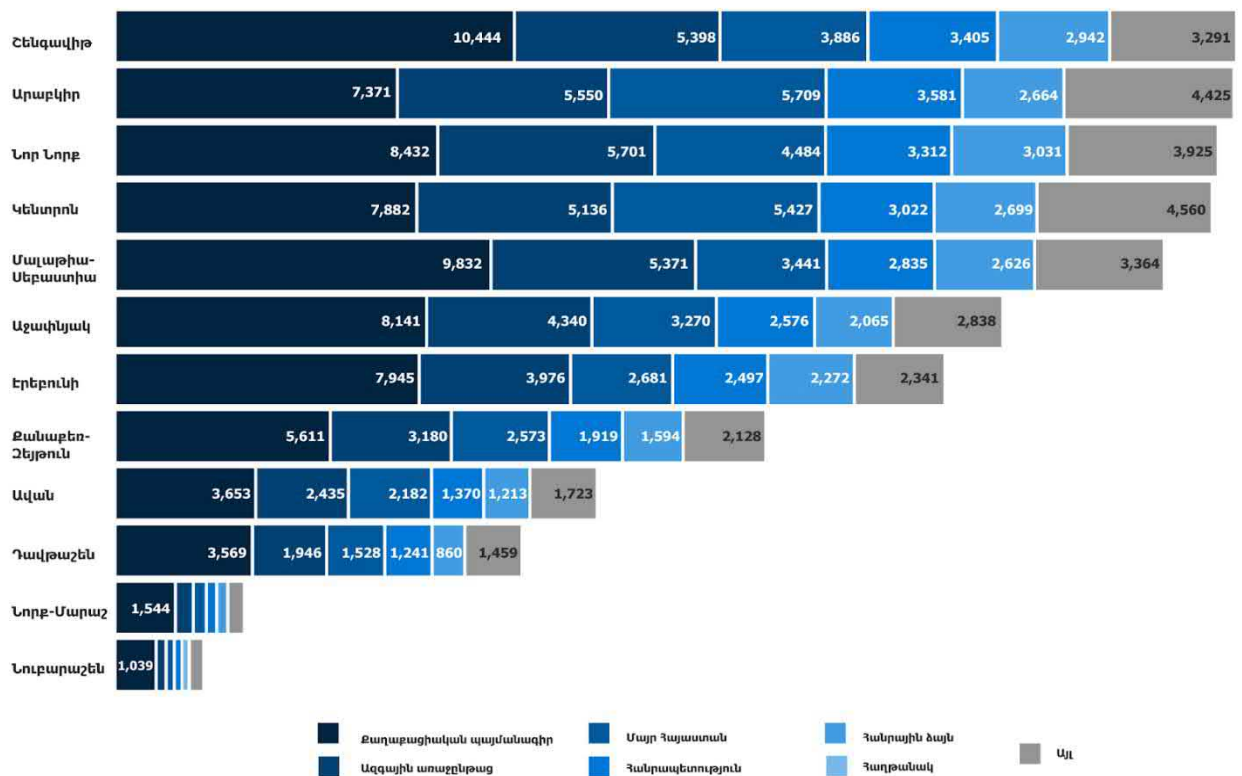
8. Formation of the Municipal Council and Election of Mayor

The vote count of Yerevan municipal elections showed that 5 political forces passed the minimal threshold set out by the Electoral Code (4% for parties and 6% for alliances) to be elected. The Municipal Council of Yerevan is thus [comprised](#) of "Civil Contract" (32.57%), "National Progress" (18.89%), "Republic" (11.32%) and "Public Voice" (9.68%) parties and "Mother Armenia" alliance of parties (15.43%).



"Civil Contract" earned the highest percentage of its votes in Shengavit and Malatia-Sebastia administrative districts and the lowest in Nork-Marash and Nubarashen.

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Election of Yerevan Mayor

To ensure quorum for the convening of Yerevan Municipal Council, including the first one during which the Council elects Mayor, the majority of the 65-member Council has to be present (33 and more). Before the first convening, "National Progress" party had proposed to "Mother Armenia" and "Public Voice" which positioned themselves as oppositional, not to attend the convening and create a situation in which new elections would have to be announced.

On October 10, the newly formed Municipal Council convened its first hearing in the absence of "National Progress" and "Mother Armenia" factions. With the presence of 5 of the elected 7 members of "Public Voice," quorum was ensured and 37 Council members embarked on electing Yerevan Mayor.

Only one candidate was nominated – Tigran Avinyan, front-runner of "Civil Contract" party. To be elected, Avinyan would need to receive 40% of the votes of those present, that made 26 persons voting "in favor" of him. Tigran Avinyan received 32 votes "in favor" (most likely by the members of "Civil Contract" and "Republic" parties) and 5 votes "against" and was thus [elected Mayor](#). On the same day, "Civil Contract" and "Republic" parties signed a [memorandum of partnership](#) by which they pledged to govern Yerevan jointly, in other words, they would mutually agree upon all appointments for the executive body of Yerevan.

The decision of "Public Voice" party members to not boycott the first municipal council convening occurred in a time when [news](#) came out about a court decision to reject extension of party president Artak Galstyan's wife's detention. This stirred questions among the public about possible misuse of the judiciary resource and a political transaction.

Wider public outcry followed the Oath of Office ceremony of Yerevan Mayor, for which the municipality [spent](#) more than 87mln AMD, much more than ever spent on oath of office ceremonies for [previous](#) mayors of Yerevan. According to data available to us, no costs were incurred for the oath of office ceremonies of Yerevan Mayors elected before the 2018 revolution.

Another fact of concern was the [ban](#) of journalist access to Yerevan Municipality to record the oath of office ceremony of the newly elected Mayor. The official excuse that there was limited space was not valid.

RECOMMENDATIONS

To improve electoral processes, enhance the democratic principles by which they are guided, establish justice and increase public trust towards electoral processes and results, as well as to ensure the further effectiveness, transparency and accountability of local self-government bodies, it is necessary to revise the Electoral Code and affiliated regulations, specifically those related to organization of local elections, electoral practices and approaches pertaining to them.

Formation of the local self-government body

1. Set out a mandatory requirement in the Law on Self-governance in Yerevan City that in the event Yerevan Mayor resigns or the position is left vacant on any other grounds, new elections of Mayor be held and if they fail, legal ramifications must follow, including snap elections of the Municipal Council must be appointed. Set out a maximum possible term for the institute of an acting official.
2. Set out regulations by which municipal council members of a community may not hold any other public service post. This will ensure the full autonomy and independence of local self-governance.

Electoral Commissions

3. Set out gender quotas in the distribution of positions for electoral commission chairpersons, deputies and secretaries in order to have a proportional representation.
4. Revise the procedure by which DEC members are formed and lower the number of nominations by parties and increase the proportion of appointments by PECs (with the exception of party members or representatives running for the given elections) and simultaneously create safeguards for a more professional, unbiased and responsible execution of functions by commission members.
5. Set out a requirement by which the biographies of PEC members will be published on CEC website, as well as the main jobs (workplaces) of DEC members to enable public scrutiny over possible incompatibility of existing jobs with the functions of electoral commission members.
6. Establish rules of ethics for DEC members and PECs, which will prevent situations of conflict of interest, including bans on receipt of gifts, including treatings by political forces, state and local self-government bodies.
7. Improve the processes and methodology of recruitment, selection and training of PEC and DEC members with the aim of enrolling knowledgeable and professional staff.
8. Empower CEC and DEC members with a toolkit of more effective and initiative-taking oversight over the campaign processes (for example, set out a requirement for mass media monitoring, scrutiny over dissemination of promotional (including associated) materials in communities, scrutiny over the set-up of polling station venues by frequent visits etc.) in order to prevent and eliminate electoral irregularities.
9. Create technical possibilities for the electronic voter devices to print the zero tape (zero report) in a timely manner.
10. Take measures to ensure highest possible level of accessibility of information on CEC website, including through publishing in open data formats which allow for data processing, reuse and search.
11. Set up a hotline during the period of election campaign for alerts on campaign irregularities in order to increase the effectiveness of oversight by CEC and DEC members.

Voter lists

12. Verify and clarify suspicious addresses and those with a large number of registered voters and ensure that the police proactively clarify questions related to such addresses before the elections. Document the existing issues, causes and solutions in the regular reports of CEC submitted to the National Assembly.

13. Take measures to ensure the signatures of voters who have signed in voter lists are effectively hidden in published voter lists in order to protect private data. The personal stamps made by the PEC member in the respective cell of the voter lists is ample to confirm the fact that the voter has participated in the elections.

Parties/alliances

14. Expand the scope of persons deemed as "holders of information" by the Law on Freedom of Information and include all parties running for national or local elections in the given year and past three years. Those who run for office should be ready to bear responsibility for transparency and accountability.
15. Establish speedy trial procedures for lawsuits related to violations of the Law on Freedom of Information by political parties who are deemed as "holders of information" in the electoral processes.
16. Set out a clear requirement that a party alliance must run for the elections in situations when the candidate list of one party includes any representative of the governing body of another party or a certain number of members from the other party (for example, up to 10%).
17. Set out a mechanism, in the event candidates recuse themselves from the candidate list of a party or alliance, by which the requirement that the party lists may include maximum 30% of non-party members is properly followed.
18. Set out a requirement, in the event female candidates use themselves from the party or alliance lists, by which the female candidates will be replaced by the next person on the party list of the same gender in order to ensure the 30% gender quota set out by law.

Campaign

19. Clarify the rules by which space is fairly distributed on sites designated for free dissemination of campaign promotional materials, including posters, print and other materials in order to ensure equal opportunities for parties in real life. Set out effective oversight tools and adequate measures to hold parties accountable for violating the given rules so that these violations are prevented from happening again.
20. Clarify the period in which the head of the community must remove campaign materials found in non-designated and banned sites, and set forth administrative charges for not carrying out this duty.
21. Apply administrative charges against political parties, as set out by law, for gluing (installing) promotional materials in non-designated and banned sites in order to prevent this practice from repeating.
22. Set out administrative charges for violating rules on non-discriminatory and unbiased dissemination of campaign materials (billboards, banners etc.) by companies owning advertising billboards.
23. Expand the procedure set out by CEC on distributing billboards above 5 square meters to all banners/billboards of 1-5 square meters and automate this procedure in order to ensure proportional distribution and to prevent concentration of billboard ads by one party in a certain area.

24. Eliminate the possibility of gluing (installing) campaign ads in the elevators (inside and on external doors) of residential apartment buildings given that it limits the equal accessibility of residents to the information of all the competing political forces.
25. Deem forcing minors to participate in a rally or offering material benefits to do so as a factor aggravating the offence.

Online campaign

26. Establish charges for online media which do not mark campaign commercials and videos with disclaimers ("election campaign" subtitles), do not publish information on who ordered these commercials, and publish commercials without a written contract signed with the party or its representative.
27. Conduct research and analysis of fake online accounts most active during the campaign, as well as of the political advertisement disseminated online in order to evaluate their real impact on the political environment of Armenia with a view to develop a respective policy in the future.
28. Actively cooperate with social media managing platforms in order to develop a toolbox of identifying fake information dissemination and fake users and to end their influence.

Regulation of engaging third parties

29. Define the term "third party" used in an election campaign and include in its scope at least those legal entities (NGOs, foundations etc.) whose names fully or partly coincide with the names of parties or whose executive representatives are fully or partly permanent members of the executive bodies of parties. Also, include in its scope those legal entities, which directly or indirectly carry out campaign or counter-campaign.
30. Limit the expenditures (for example, up to 2,000,000 AMD) and financial sources of third parties during the campaign period and set out a reporting requirement for them (for example, making expenditures above 500,000 AMD subject to declaration).
31. Set out a ban on third parties too for receiving donations from foreign governments, international organizations, foreign legal or natural persons for campaign purposes and using the received donations for campaign purposes.

Misuse of administrative resources

32. Limit additional financing from the state budget for purposes not related to development/annual programs at least 6 months prior to the elections, with the exception of emergencies.
33. Forbid heads of condominiums from engaging in campaign while on duty or acting *ex officio*.
34. Set out a clear ban for officials on combining election campaign with official site visits, as well as for staying in a given site (region or community) after an official visit and conducting an election campaign.
35. Set out a ban on offering financial benefits or increase of their amounts not already planned in state or local budgets, including state pensions, welfare benefits, cash assistance or cancellation of debt, at least starting the date elections are announced, with the exception of unforeseen and urgent measures which are approved by a

representative body (National Assembly of Armenia, municipal council of a community).

36. Include a section and relevant materials in the trainings of public servants on what administrative resources are and how they can be misused during elections, and include relevant provisions in the codes of conduct of public servants.
37. Establish a function for CEC to evaluate whether certain activities and expenditures by state or local government bodies during the campaign period qualify as election campaign.

Election foundations and expenditures

38. Set out a uniform approach for filling in annual party reports, declarations of properties and income owned by parties, declarations on campaign foundations, clarify the format of presented data and develop respective guidelines that will be detailed and user-friendly.
39. Centralize all the oversight functions over parties within one body.
40. Set out a requirement and mechanism of accountability for verifying compliance of party reports, declarations on properties and income owned by parties, deposits on and expenditures from campaign foundation accounts with the required format and for analyzing the data of the mentioned reports.
41. Make election campaign foundation deposits exclusively by an ID card.
42. Set out a requirement for disclosing the full names of persons that donated to the party, as well as the amount of money donated by each of them in the party's property and income declarations.
43. Clarify reporting requirements for real estate and its use (both for headquarters and local offices, and campaign offices opened during the campaign period) in order to ensure a practical opportunity for comparing data and receiving a full picture.
44. Regulate the issue of returning campaign foundation donations made by individuals or parties in amounts exceeding those set out by law respectively to these individuals or parties and only if impossible, set out a requirement to transfer these amounts to the state budget.
45. Set out a requirement that all the service provision contracts signed by parties with legal or natural entities in the context of election campaign be disclosed or become accessible to election observation organizations.
46. Consider setting an online system for filling out party reports and declarations on payments to and expenditures from campaign foundations to ensure that they are machine-readable, processable, reusable and searchable.
47. Define the requirements and format for the conclusion made by the Oversight and Audit Service (oversight body) based on validation of submitted information. Make sure that the format and requirements for the conclusions include a detailed description of what was validated, the methodology of validation, all the irregularities identified by the oversight body and the categories of irregularities.

Voting and vote count

48. Set out proper mechanisms of checking and approving the appropriateness of polling station venues, including their accessibility, in order to prevent voter disenfranchisement due to non-accessibility or other violations of their rights.

49. Eliminate mismatches between the procedure of election preparation and the programming settings of electronic voter devices.
50. Set out availability of Election Day recordings on CEC website until the final date for challenging election results. Replace muted video-recording with sound video-recording.

Challenging irregularities and election results

51. Recognize the legal standing of election observation organizations in lawsuits involving violation of rights related to their status as observers, and recognize the right of observers and observation organizations to challenge objective violations of electoral rights. Consider stipulating the right of voters, observers and observation organizations to directly challenge the final results of voting/elections in the Electoral Code of Armenia.
52. Facilitate administration related to appeals by removing payment of state duties for all lawsuits related to electoral processes.
53. Revise the terms set out by the Electoral Code within which electoral commissions receive and make decisions upon appeals. The existing regulations in fact exclude the possibility for CEC to examine appeals against decisions of DEC's submitted before the finalization of election results

ABOUT THE OBSERVATION MISSION

“Akanates” Observation Mission was founded by the Transparency International Anti-Corruption Center (TIAC), “Asparez” Journalists’ Club (AJC), “Restart” Youth Initiative (currently “Restart Foundation for Science and Education”) and the “Law Development and Protection” Foundation in August 2018.

The purpose of the Mission is to promote free and fair elections in accordance with the legislation of the Republic of Armenia and international standards, as well as the legitimacy of electoral processes with the help of impartial public oversight.

“Akanates” operates independently, adhering to the principle of impartiality and refraining from actions that can be interpreted as assistance, propaganda or counterpropaganda in favor of or against any political party (alliance of parties) running for election.

<https://www.facebook.com/akanatesditord>



Transparency International Anti-Corruption Center (TIAC) was established in Yerevan in 2000. The mission of TIAC is to promote good governance in Armenia through reducing corruption and strengthening democracy.

Phone number: +37410569589, www.transparency.am



“Asparez” Journalists’ Club (AJC) was founded in Gyumri in 1999. The mission of the AJC is to protect freedom of expression, media and information.

Phone number: +37431250622, www.asparez.am



“Restart Foundation for Science and Education” was created in Yerevan in 2019. The foundation's aim is to promote reforms in higher education, which will make sure that the higher education system in Armenia is more progressive and of a higher standard.

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Law Development and Protection Foundation (LDPF) was founded in Yerevan in 2018. The activities of the Foundation are aimed at human rights protection and reforms of the legal system in the Republic of Armenia.

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